

Docket:	:	A.20-07-012
Exhibit Number	:	Cal Advocates - ____
Commissioner	:	Genevieve Shiroma
Administrative Law Judge	:	Charles Ferguson
Public Advocates Office	:	Justin Menda
Witness	:	



PUBLIC ADVOCATES OFFICE



**REPORT AND RECOMMENDATIONS
ON REGION 1 PLANT (LOS OSOS AND SANTA MARIA),
BLANKET PLANT ITEMS, AND CUSTOMER SERVICE**

Application 20-07-012

**San Francisco, California
February 16, 2021**

MEMORANDUM

1 The Public Advocates Office at the California Public Utilities Commission (Cal
2 Advocates) examined requests and data presented by Golden State Water Company
3 (GSWC) in Application (A.) 20-07-012 (Application) to provide the California Public
4 Utilities Commission (Commission) with recommendations that represent the interests of
5 ratepayers for safe and reliable service at the lowest cost. This Report is prepared by
6 Justin Menda. Eileen Odell is Cal Advocates' project lead for this proceeding. Victor
7 Chan is the oversight supervisor and Shanna Foley and Jamie Ormond are legal counsel.

8 Although every effort was made to comprehensively review, analyze, and provide
9 the Commission with recommendations on each ratemaking and policy aspect of the
10 requests presented in the Application, the absence from Cal Advocates' testimony of any
11 particular issue does not constitute its endorsement or acceptance of the underlying
12 request, or of the methodology or policy position supporting the request.

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EXECUTIVE SUMMARY

I. Introduction

This report presents Cal Advocates' analysis and recommendation of GSWC's requests related to proposed plant in the Los Osos and Santa Maria rate making areas (RMAs), proposed blanket budget, and customer service quality. This report also reflects recommendations from other Cal Advocates' witnesses' testimony regarding common plant issues. Some of these reports from other Cal Advocates' witnesses are:

- 1) the Public Advocates Office Report and Recommendations on Construction-Work-in-Progress (CWIP) and Special Request 7 (Phong Ly) regarding CWIP projects in the Los Osos and Santa Maria RMAs
- 2) the Public Advocates Office Report and Recommendations on Pipeline Replacement (Sari Ibrahim) regarding proposed pipeline projects in the Los Osos and Santa Maria RMAs
- 3) the Public Advocates Office Report and Recommendations on Region 3 Plant, Contingency, and Plant Escalation (Anthony Andrade) regarding cost add-ons (e.g. contingency)

The recommendations in this report related to the blanket budget are reflected in the testimony of other Cal Advocates witnesses. These reports from other Cal Advocates' witnesses include: 1) Public Advocates Office Report and Recommendations on Region 1 Plant (Arden-Cordova, Bay Point, Clearlake & Simi Valley) (Zaved Sarkar); 2) Public Advocates Office Report and Recommendations on Region 2 Plant and Safety Issues (Brian Yu); and 3) Public Advocates Office Report and Recommendations on Region 3 Plant, Contingency, and Plant Escalation (Anthony Andrade).

II. Summary of Recommendations

A. Chapter 1: Blanket Budget

The Commission should adopt a total budget of \$21,700,880 in 2021, \$19,997,425 in 2022, and \$19,254,700 in 2023 for GSWC's blanket budget for all RMAs and district

1 offices. Specific, individual projects that GSWC proposes to fund through the blanket
2 budget should be recorded as separate line items instead of being included in the blanket
3 budget. The Commission should allow a total of \$524,600 in 2021, \$75,500 in 2022, and
4 \$12,700 in 2023 for these individual projects.

5 B. Chapter 2: Plant – Los Osos

6 The Commission should adopt budgets of \$946,694 in 2021, \$943,500 in 2022,
7 and \$1,737,600 in 2023 for proposed projects in the Los Osos RMA.

8 C. Chapter 3: Plant – Santa Maria

9 The Commission should adopt budgets of \$2,977,391 in 2021, \$4,273,473 in
10 2022, and \$3,832,112 in 2023 for proposed projects in the Santa Maria RMA.

11 D. Chapter 4: Customer Service

12 GSWC should increase the rate of answering customer calls within 30 seconds
13 (during normal business hours) after requesting to speak with a customer service
14 representative (CSR) above the standard of at least 80% established in General Order
15 (GO) 103-A. GSWC should also continue to reduce its rate of scheduled appointments
16 missed within the company's control to be consistently below the standard of no more
17 than 5% established in GO 103-A.

CHAPTER 1: BLANKET BUDGET

I. Introduction

GSWC requests an annual blanket budget for the routine installation/replacement of plant items such as minor mains, services, meters, furniture, vehicles, and tools and equipment in each rate making area and district office.¹ According to GSWC, the blanket budget funds routine installations and replacements which “occur on a regular basis and are fairly consistent in magnitude” and is “an extrapolation of the average historical expenditures.”²

II. Summary of Recommendations

The Commission should adjust GSWC’s blanket budget request, as follows:

1. The blanket budget should exclude the individual projects GSWC proposes to be funded through the blanket budget which instead should be recorded as separate line items. The total budget for these projects should be \$524,600 in 2021, \$75,500 in 2022, and \$12,700 in 2023.
2. The blanket budget should exclude the Country Club Treatment Plant Programmable Logic Controller (PLC) Upgrade project because GSWC withdrew its request for funding the project.
3. The total blanket budget should be \$21,700,880 in 2021, \$19,997,425 in 2022, and \$19,254,700 in 2023 for all RMAs and district offices.

The recommendations listed above are reflected in the blanket budget for 2021-2023 as shown in the table below.

¹ Prepared Testimony of Robert Hanford and Mark Insko, at pp. 28-32, 44-56, 59-69, 74-81, 93-100, 109-120, 129-136, 153-159, 161-171, 175-190, 195-202, 210-220, 226-232, 237-244, 253-261, 269-276, 278-285, 290-294, 303-310, and 313-320 (GSWC Capital Testimony).

² GSWC Capital Testimony, at pp. 28-32, 44-56, 59-69, 74-81, 93-100, 109-120, 129-136, 153-159, 161-171, 175-190, 195-202, 210-220, 226-232, 237-244, 253-261, 269-276, 278-285, 290-294, 303-310, and 313-320.

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Table 1-1: GSWC Proposed Blanket Budget (2021-2023)³

RMA/ District Office	2021	2022	2023	Total
Arden Cordova	\$ 3,224,600	\$ 2,699,500	\$ 2,437,800	\$ 8,361,900
Bay Point	\$ 547,600	\$ 555,900	\$ 564,200	\$ 1,667,700
Clearlake	\$ 234,800	\$ 243,900	\$ 310,000	\$ 788,700
Northern District Office	\$ 96,200	\$ 25,900	\$ 59,900	\$ 182,000
Los Osos	\$ 553,000	\$ 398,400	\$ 489,400	\$ 1,440,800
Santa Maria	\$ 1,303,500	\$ 1,345,100	\$ 1,207,100	\$ 3,855,700
Simi Valley	\$ 563,200	\$ 511,400	\$ 455,400	\$ 1,530,000
Coastal District Office	\$ 53,100	\$ 15,300	\$ 49,200	\$ 117,600
Central Basin East	\$ 1,537,100	\$ 1,380,900	\$ 1,464,300	\$ 4,382,300
Central Basin West	\$ 1,559,900	\$ 1,111,500	\$ 1,128,000	\$ 3,799,400
Culver City	\$ 1,228,000	\$ 1,028,000	\$ 981,300	\$ 3,237,300
Central District Office	\$ 257,200	\$ 119,300	\$ 253,600	\$ 630,100
Southwest	\$ 3,498,500	\$ 4,202,300	\$ 3,571,300	\$ 11,272,100
Southwest District Office	\$ 54,200	\$ 55,000	\$ 118,300	\$ 227,500
Los Alamitos	\$ 1,291,900	\$ 1,311,400	\$ 1,365,500	\$ 3,968,800
Placentia	\$ 705,600	\$ 654,700	\$ 717,600	\$ 2,077,900
Orange County District Office	\$ 251,900	\$ 10,200	\$ 111,800	\$ 373,900
Claremont	\$ 858,800	\$ 810,300	\$ 822,400	\$ 2,491,500
San Dimas	\$ 1,135,300	\$ 1,011,000	\$ 991,800	\$ 3,138,100
San Gabriel	\$ 797,500	\$ 850,900	\$ 812,500	\$ 2,460,900
Foothill District Office	\$ 374,900	\$ 150,200	\$ 222,500	\$ 747,600
Apple Valley	\$ 517,500	\$ 299,300	\$ 309,800	\$ 1,126,600
Barstow	\$ 1,620,600	\$ 1,357,800	\$ 1,378,200	\$ 4,356,600
Calipatria	\$ 240,700	\$ 183,000	\$ 248,100	\$ 671,800
Morongo	\$ 106,300	\$ 108,000	\$ 109,600	\$ 323,900
Wrightwood	\$ 389,700	\$ 203,600	\$ 206,700	\$ 800,000
Mountain Desert District Office	\$ 43,500	\$ 5,600	\$ 5,700	\$ 54,800
Total	\$ 23,045,100	\$ 20,648,400	\$ 20,392,000	\$ 64,085,500

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Table 1-2: Cal Advocates Recommended Blanket Budget (2021-2023)

³ GSWC RO Model, workpaper: SEC-51_RB_FDR Capital Budget, tab: Project List – DO NOT SORT!.

RMA/ District Office	2021	2022	2023	Total
Arden Cordova	\$ 3,224,600	\$ 2,638,100	\$ 2,437,800	\$ 8,300,500
Bay Point	\$ 547,600	\$ 555,900	\$ 564,200	\$ 1,667,700
Clearlake	\$ 234,800	\$ 243,900	\$ 247,600	\$ 726,300
Northern District Office	\$ 96,200	\$ 25,900	\$ 59,900	\$ 182,000
Los Osos	\$ 452,060	\$ 385,600	\$ 349,400	\$ 1,187,060
Santa Maria	\$ 1,243,005	\$ 1,222,225	\$ 1,207,100	\$ 3,672,330
Simi Valley	\$ 442,200	\$ 448,700	\$ 455,400	\$ 1,346,300
Coastal District Office	\$ 53,100	\$ 15,300	\$ 49,200	\$ 117,600
Central Basin East	\$ 1,481,500	\$ 1,319,500	\$ 1,339,600	\$ 4,140,600
Central Basin West	\$ 1,183,405	\$ 1,111,500	\$ 1,128,000	\$ 3,422,905
Culver City	\$ 1,073,500	\$ 966,600	\$ 981,300	\$ 3,021,400
Central District Office	\$ 238,700	\$ 15,300	\$ 121,100	\$ 375,100
Southwest	\$ 3,377,580	\$ 4,202,300	\$ 3,269,800	\$ 10,849,680
Southwest District Office	\$ 54,200	\$ 55,000	\$ 55,900	\$ 165,100
Los Alamitos	\$ 1,231,400	\$ 1,250,000	\$ 1,268,700	\$ 3,750,100
Placentia	\$ 705,600	\$ 654,700	\$ 717,600	\$ 2,077,900
Orange County District Office	\$ 191,440	\$ 10,200	\$ 10,300	\$ 211,940
Claremont	\$ 858,800	\$ 810,300	\$ 822,400	\$ 2,491,500
San Dimas	\$ 1,074,840	\$ 1,011,000	\$ 991,800	\$ 3,077,640
San Gabriel	\$ 797,500	\$ 747,900	\$ 759,400	\$ 2,304,800
Foothill District Office	\$ 314,430	\$ 150,200	\$ 222,500	\$ 687,130
Apple Valley	\$ 484,100	\$ 299,300	\$ 309,800	\$ 1,093,200
Barstow	\$ 1,620,600	\$ 1,357,800	\$ 1,378,200	\$ 4,356,600
Calipatria	\$ 240,700	\$ 183,000	\$ 185,700	\$ 609,400
Morongo	\$ 106,300	\$ 108,000	\$ 109,600	\$ 323,900
Wrightwood	\$ 329,220	\$ 203,600	\$ 206,700	\$ 739,520
Mountain Desert District Office	\$ 43,500	\$ 5,600	\$ 5,700	\$ 54,800
Total	\$ 21,700,880	\$ 19,997,425	\$ 19,254,700	\$ 60,953,005

Table 1-3: Cal Advocates Recommended Budget for Individual Projects

Proposed by GSWC—to be Funded Outside the Blanket Budget (2021-2023)

Project Description	RMA/ District Office	Project Cost		
		2021	2022	2023
Manzanita Monitoring Plan	Los Osos	\$ 14,200	\$ 12,800	\$ 12,700
Country Club Treatment Plant PLC Upgrade	Los Osos	\$ -	\$ -	\$ -
Server Room	Los Osos	\$ 26,300	\$ -	\$ -
Office Remodel	Simi Valley	\$ -	\$ 62,700	\$ -
Data Logger	Central District Office	\$ 18,500	\$ -	\$ -
Juan Backwash Tank	Central Basin East	\$ 55,600	\$ -	\$ -
McKinley Well #3 Pump Base Upgrade	Central Basin West	\$ 117,300	\$ -	\$ -
Replace Backhoe	Central Basin West	\$ 138,200	\$ -	\$ -
Sentney Solar Bee	Culver City	\$ 30,900	\$ -	\$ -
Replace Backhoe	Culver City	\$ 123,600	\$ -	\$ -
Total		\$ 524,600	\$ 75,500	\$ 12,700

III. Discussion

A. Individual Projects Proposed by GSWC that Should be Excluded from the Blanket Budget

GSWC's blanket budget request includes proposed individual projects listed in Table 1-4. GSWC adds the costs for each of the proposed individual projects to the annual recorded blanket budget to calculate its requested annual blanket budget before adding other costs (e.g., contingency). Cal Advocates did not include the cost for the proposed Country Club Treatment Plant PLC Upgrade project in Table 1-4 because GSWC withdrew this project.

The Commission should exclude the proposed individual projects listed in Table 1-4 in setting the blanket budget. Instead, the costs for these proposed individual projects should be recorded separately and funded outside the blanket budget. The Commission should allow no greater than a combined total of \$612,800 in 2021-2023 for these proposed individual projects.

Table 1-4: Proposed Individual Projects that should be Recorded and Funded Outside the Blanket Budget⁴

⁴ The proposed budget was calculated by subtracting the proposed amount due to historical expenditure (with cost add-ons) from the proposed blanket group budget.

Project Description	Year	RMA/District Office	Blanket Group	Project Cost
Manzanita Monitoring Plan	2021	Los Osos	Main Pumping Plant	\$ 14,200
	2022	Los Osos	Equipment and	\$ 12,800
	2023	Los Osos	Structure	\$ 12,700
Country Club Treatment Plant PLC Upgrade	2023	Los Osos	Purification Equipment and Structure	\$ 127,300
Server Room	2021	Los Osos	Additions to General Structure	\$ 26,300
Office Remodel	2022	Simi Valley	Additions to General Structure	\$ 62,700
Data Logger	2021	Central District Office	Tools & Safety Equipment	\$ 18,500
Juan Backwash Tank	2021	Central Basin East	Main Pumping Plant Equipment and Structure	\$ 55,600
McKinley Well #3 Pump Base Upgrade	2021	Central Basin West	Main Pumping Plant Equipment and Structure	\$ 117,300
Replace Backhoe	2021	Central Basin West	Tools & Safety Equipment	\$ 138,200
Sentney Solar Bee	2021	Culver City	Main Pumping Plant Equipment and Structure	\$ 30,900
Replace Backhoe	2021	Culver City	Tools & Safety Equipment	\$ 123,600
Total				\$ 740,100

For many of the blanket groups, GSWC calculates the budget based on average historical expenditure.⁵ Including specific, individual projects' costs in the blanket budget artificially inflates what GSWC normally spends on routine projects because these projects are not routine. This inflated historical expenditure would then be used to justify a larger blanket budget in future rate cases. GSWC should remove the cost for these planned projects from the blanket budget and present them as separate line items, which can be individually reviewed for reasonableness and prudence. The Commission should adopt this requirement so that GSWC will not receive funding for unique capital projects

⁵ GSWC RO Model, workpaper: Y_SEC-50_RB_2020 GRC Blankets Capital Projects, tab: [RMA/District Office].

1 through the blanket budget in future rate cases. In addition to moving these project costs
2 out of the blanket budget, the amounts for one project should be removed entirely
3 because GSWC has withdrawn its request for the project as discussed below.

4 1. Country Club Treatment Plant PLC Upgrade (Los Osos)

5 The final decision adopted in this case should reflect GSWC's withdrawal of its
6 request for \$127,300 in the 2023 blanket budget to replace PLCs at the Country Club
7 Treatment Plant. GSWC acknowledges that these replacements are duplicative of those
8 included in the Country Club Treatment Plant portion of the Los Osos, Systemwide
9 Supervisory Control and Data Acquisition (SCADA) project request.⁶ GSWC requests in
10 2023 an additional \$127,300⁷ over what it normally spends on the purification equipment
11 and structure blanket group for upgrading the existing PLCs at the Country Club
12 Treatment Plant.⁸

13 GSWC plans to upgrade SCADA at multiple sites as part of the proposed Los
14 Osos, Systemwide SCADA project, including at the Country Club Treatment Plant.⁹
15 GSWC plans to upgrade the PLC, telemetry, and operator interface terminal (OIT) at the
16 Country Club Treatment Plant.¹⁰ According to the proposed Country Club Treatment
17 Plant PLC Upgrade project scope, the existing PLCs will be compiled into a single
18 PLC.¹¹ A portion of the project scope between the two projects overlaps one another.

19 GSWC acknowledges that the scope of the Los Osos, Systemwide SCADA project
20 related to the Country Club Treatment Plant and the proposed PLC upgrades being

⁶ Attachment 1-3, GSWC Response to Public Advocates DR JMI-012, Q.2.a.

⁷ The proposed budget was calculated by subtracting the proposed amount due to historical expenditure (with cost add-ons) from the proposed blanket group budget.

⁸ GSWC RO Model, workpaper: 2020 GRC Blankets Capital Projects Template_R1-LO_Final APP, tab: B8-CC Plant PLC Upgrade.

⁹ Attachment 1-2, GSWC Response to Public Advocates DR JMI-004, Q.2.a.

¹⁰ Attachment 1-2, GSWC Response to Public Advocates DR JMI-004, Q.2.b.

¹¹ GSWC RO Model, workpaper: 2020 GRC Blankets Capital Projects Template_R1-LO_Final APP, tab: B8-CC Plant PLC Upgrade.

funded through the blanket budget are similar.¹² GSWC states that it is only requesting PLC upgrades as part of the Los Osos, Systemwide SCADA project and is withdrawing its request for PLC upgrades through the blanket budget.¹³ Therefore, the Commission should not allow any funding for this project in the blanket budget.

B. Vehicle Replacement

The Commission should reduce GSWC's request of \$3,375,200 to \$2,555,580 in 2021, \$706,800 to \$235,325 in 2022, and \$1,265,900 to \$268,600 in 2023¹⁴ because 39 vehicles do not need to be replaced at this time. GSWC requests to replace approximately 97 vehicles among its RMAs, district offices, and General Office during the 2021-2023 period.¹⁵ GSWC's request to replace the proposed vehicles is funded through the proposed vehicles blanket group budget for each RMA and district office.¹⁶ The table below shows the proposed vehicle replacement budget.

Table 1-5: Proposed Vehicle Replacement Budget¹⁷

¹² Attachment 1-3, GSWC Response to Public Advocates DR JMI-012, Q.2.a.

¹³ Attachment 1-3, GSWC Response to Public Advocates DR JMI-012, Q.2.a.

¹⁴ GSWC RO Model, workpaper: SEC-51_RB_FDR Capital Budget, tabs: Project List – DO NOT SORT! and GO Project List.

¹⁵ GSWC RO Model, workpaper: Y_SEC-50_RB_2020 GRC Blankets Capital Projects, tab: Vehicle List. GSWC RO Model, workpaper: SEC-51_RB_FDR Capital Budget, tab: GO Project List.

¹⁶ GSWC RO Model, workpaper: Y_SEC-50_RB_2020 GRC Blankets Capital Projects, tab: [RMA/District Office]. The vehicles blanket group is one of the blanket groups that make up the total blanket budget. GSWC requests to replace vehicles in General Office as individual projects.

¹⁷ GSWC RO Model, workpaper: SEC-51_RB_FDR Capital Budget, tabs: Project List – DO NOT SORT! and GO Project List.

RMA/ District Office	2021	2022	2023	Total
Arden Cordova	\$ 216,800	\$ 61,400	\$ -	\$ 278,200
Bay Point	\$ -	\$ -	\$ -	\$ -
Clearlake	\$ -	\$ -	\$ 62,400	\$ 62,400
Northern	\$ 70,700	\$ -	\$ 33,700	\$ 104,400
Los Osos	\$ 181,400	\$ -	\$ -	\$ 181,400
Santa Maria	\$ 148,800	\$ 184,300	\$ -	\$ 333,100
Simi Valley	\$ 121,000	\$ -	\$ -	\$ 121,000
Coastal	\$ 38,000	\$ -	\$ 33,700	\$ 71,700
Central Basin East	\$ 181,400	\$ 61,400	\$ 124,700	\$ 367,500
Central Basin West	\$ 209,300	\$ -	\$ -	\$ 209,300
Culver City	\$ 121,000	\$ 61,400	\$ -	\$ 182,400
Central District	\$ 121,000	\$ -	\$ 132,500	\$ 253,500
Southwest	\$ 257,000	\$ 62,200	\$ 301,500	\$ 620,700
Southwest District	\$ -	\$ -	\$ 62,400	\$ 62,400
Claremont	\$ 60,500	\$ -	\$ -	\$ 60,500
San Dimas	\$ 172,600	\$ 33,900	\$ -	\$ 206,500
San Gabriel	\$ 60,500	\$ 103,000	\$ 53,100	\$ 216,600
Foothill District	\$ 227,000	\$ -	\$ 70,100	\$ 297,100
Apple Valley	\$ 222,400	\$ -	\$ -	\$ 222,400
Barstow	\$ 282,900	\$ -	\$ -	\$ 282,900
Calipatria	\$ 60,500	\$ -	\$ 62,400	\$ 122,900
Morongo	\$ -	\$ -	\$ -	\$ -
Wrightwood	\$ 189,000	\$ -	\$ -	\$ 189,000
Mountain Desert	\$ 38,000	\$ -	\$ -	\$ 38,000
Los Alamitos	\$ 60,500	\$ 61,400	\$ 96,800	\$ 218,700
Placentia	\$ 60,500	\$ -	\$ 53,100	\$ 113,600
Orange County District Office	\$ 241,900	\$ -	\$ 101,500	\$ 343,400
General Office - Central Operations	\$ 32,500	\$ 77,800	\$ -	\$ 110,300
General Office - Corporate Support	\$ -	\$ -	\$ 78,000	\$ 78,000
Total	\$ 3,375,200	\$ 706,800	\$ 1,265,900	\$ 5,347,900

GSWC requests to replace those vehicles it expects to reach the following mileage replacement criteria during this rate case period: 1) 100,000 miles for sedans, pickup trucks, and sport utility vehicles (SUV) with a gross vehicle weight rating (GVWR) up to

1 8500 lbs.; and 2) 120,000 miles for trucks, vans, and SUVs with a GVWR between
2 8,501lbs and 16,000 lbs.¹⁸

3 Instead, GSWC should use the following mileage criteria for vehicle replacement
4 based on the California Department of General Services (DGS) standard: 1)120,000 miles
5 for vehicles with a GVWR of up to 8,500 lbs. and 2)150,000 miles for heavy duty trucks,
6 vehicles with a GVWR exceeding 8,500 lbs., or four wheel drive vehicles.¹⁹ GSWC used
7 this mileage standard as a justification to replace vehicles in its 2017 rate case (A.17-07-
8 010).²⁰ The Commission determined that the usage of 150,000 miles as the mileage
9 criteria was appropriate for heavy trucks in GSWC's 2014 rate case (A.14-07-006).²¹
10 GSWC does not justify the change in mileage criteria. GSWC Capital Testimony
11 generally states that vehicles with high mileage typically incur maintenance that exceeds
12 the value of the vehicle.²² However, GSWC does not provide any evidence to support
13 this claim. Except for two vehicles (Vehicles 2100 and 786), GSWC uses only the
14 vehicles' mileage to justify replacing the proposed vehicles based on their standard.²³

15 GSWC proposes replacing two vehicles (Vehicles 2100 and 786) due to the
16 vehicles' existing condition.²⁴ Vehicle 2100 was purchased in 2005, and GSWC states
17 that the vehicle requires repairs costing between \$18,000 and \$19,000.²⁵ GSWC states

¹⁸ GSWC Capital Testimony, at p. 49.

¹⁹ The April 22, 2008 State of California Fleet Handbook – A Guide to Fleet, Travel, and Parking Policy, at p. 4.

²⁰ Prepared Testimony of Robert McVicker, Mark Insko, Todd Waltz and Divya Agrawalla (from A.17-07-010), at pp. 64-66, 82-83, 122-125, 140-142, 144-145, 165-166, 180-183, 225- 231, 243, 289, 310-312, 323, 342-343, 352, and 363-364.

²¹ Decision (D).16-12-067, p. 48. In the Transportation Equipment section of the Prepared Testimony of Robert McVicker and Mark Insko (from A.14-07-006), GSWC states that it used a 120,000 mile criteria for all vehicles.

²² GSWC Capital Testimony, at p. 49.

²³ GSWC Capital Testimony, at pp. 29-30, 48-49, 62,66, 77-78, 96-98, 113, 117-118, 132-134, 156-157,164-165, 168-169, 178-180, 185-187, 198-199, 213, 216-217, 229-230, 240-242, 256-257, 261, 272-274, 282, 307-308, and 317-318.

²⁴ GSWC Capital Testimony, at pp.179-181.

²⁵ GSWC Capital Testimony, at p. 179.

1 that Vehicle 786²⁶ has been out of service since May 2019 due to mechanical issues.²⁷
2 In addition, GSWC states that repair costs for Vehicle 786 exceed the current value of the
3 vehicle.²⁸ GSWC provided the repair quotes related to Vehicles 2100 and 786.²⁹ Due to
4 the condition and cost to repair Vehicles 2100 and 786, Cal Advocates does not oppose
5 the aforementioned vehicles' replacement.

6 The projected mileage for each vehicle GSWC requests to replace in this rate case
7 was calculated through the end of the rate case cycle (through 2023). GSWC provided
8 the mileage of the proposed vehicles (as of September 30, 2019).³⁰ The average mileage
9 per year was calculated based on when the proposed vehicle was purchased.³¹ The
10 proposed vehicles' mileage was then projected through the end of the rate case cycle
11 (through 2023). Based on the GVWR³² and the projected mileage (through 2023), the
12 proposed vehicles were evaluated on whether they should be replaced in this rate case
13 cycle. The Commission should only allow the 2021-2023 vehicle replacement projects
14 shown in the table in Attachment 1-4.³³

15 GSWC calculates the annual vehicles blanket group budget by 1) adding the
16 replacement costs for vehicles in that particular year;³⁴ and then 2) applying the cost add-
17 ons.³⁵ The table below shows the vehicle replacement budget the Commission should
18 adopt in this rate case.

²⁶ GSWC states that Vehicle 786 was purchased in 1999.

²⁷ GSWC Capital Testimony, at p. 180.

²⁸ GSWC Capital Testimony, at p.181.

²⁹ GSWC Response to Public Advocates DR JMI-003, Q.1.b and 1.c.

³⁰ GSWC RO Model, workpaper: GSWC Vehicle Data (2021-2023 GRC), tab: GSWC Vehicle Data (GRC).

³¹ GSWC RO Model, workpaper: GSWC Vehicle Data (2021-2023 GRC), tab: GSWC Vehicle Data (GRC). The date closed to plant was used as the start date.

³² GSWC Response to Public Advocates DR JMI-003, Q.1.a.

³³ Attachment 1-4, Cal Advocates' Recommended Vehicle Replacement.

³⁴ GSWC RO Model, workpaper: Y_SEC-50_RB_2020 GRC Blankets Capital Projects, tab: [RMA/District Office].

³⁵ GSWC RO Model, workpaper: SEC-51_RB_FDR Capital Budget, tab: Project List – DO NOT SORT!.

Table 1-6: Recommended Vehicle Replacement Budget

RMA/ District Office	2021	2022	2023	Total
Arden Cordova	\$ 216,800	\$ -	\$ -	\$ 216,800
Bay Point	\$ -	\$ -	\$ -	\$ -
Clearlake	\$ -	\$ -	\$ -	\$ -
Northern	\$ 70,700	\$ -	\$ 33,700	\$ 104,400
Los Osos	\$ 120,960	\$ -	\$ -	\$ 120,960
Santa Maria	\$ 88,305	\$ 61,425	\$ -	\$ 149,730
Simi Valley	\$ -	\$ -	\$ -	\$ -
Coastal	\$ 38,000	\$ -	\$ 33,700	\$ 71,700
Central Basin East	\$ 181,400	\$ -	\$ -	\$ 181,400
Central Basin West	\$ 88,305	\$ -	\$ -	\$ 88,305
Culver City	\$ 121,000	\$ -	\$ -	\$ 121,000
Central District	\$ 121,000	\$ -	\$ -	\$ 121,000
Southwest	\$ 136,080	\$ 62,200	\$ -	\$ 198,280
Southwest District	\$ -	\$ -	\$ -	\$ -
Claremont	\$ 60,500	\$ -	\$ -	\$ 60,500
San Dimas	\$ 112,140	\$ 33,900	\$ -	\$ 146,040
San Gabriel	\$ 60,500	\$ -	\$ -	\$ 60,500
Foothill District	\$ 166,530	\$ -	\$ 70,100	\$ 236,630
Apple Valley	\$ 189,000	\$ -	\$ -	\$ 189,000
Barstow	\$ 282,900	\$ -	\$ -	\$ 282,900
Calipatria	\$ 60,500	\$ -	\$ -	\$ 60,500
Morongo	\$ -	\$ -	\$ -	\$ -
Wrightwood	\$ 128,520	\$ -	\$ -	\$ 128,520
Mountain Desert	\$ 38,000	\$ -	\$ -	\$ 38,000
Los Alamitos	\$ -	\$ -	\$ -	\$ -
Placentia	\$ 60,500	\$ -	\$ 53,100	\$ 113,600
Orange County District Office	\$ 181,440	\$ -	\$ -	\$ 181,440
General Office - Central Operations	\$ 32,500	\$ 77,800	\$ -	\$ 110,300
General Office - Corporate Support	\$ -	\$ -	\$ 78,000	\$ 78,000
Total	\$2,555,580	\$ 235,325	\$ 268,600	\$ 3,059,505

IV. Conclusion

The Commission should make the following adjustments to GSWC's requests for the blanket budget:

1. The blanket budget should exclude the individual projects GSWC proposes to be funded through the blanket budget which instead should be recorded as separate line items. The total budget for these projects should be \$524,600 in 2021, \$75,500 in 2022, and \$12,700 in 2023.
2. The blanket budget should exclude the Country Club Treatment Plant PLC Upgrade project because GSWC withdrew its request for funding the project.
3. The total blanket budget should be \$21,700,880 in 2021, \$19,997,425 in 2022, and \$19,254,700 in 2023 for all RMAs and district offices.

[END OF CHAPTER]

CHAPTER 2: PLANT – LOS OSOS

I. Introduction

Cal Advocates recommends adjustments to GSWC’s capital budget requests for the Los Osos RMA, which consists of Los Osos and Edna Road water systems.

II. Summary of Recommendations

Cal Advocates does not oppose the need for the proposed projects in 2021-2023. However, the Commission should adjust GSWC’s request based on Cal Advocates’ recommendations for common plant issues for the Los Osos RMA, as discussed in full in Chapter 1 of this report, the Public Advocates Office Report and Recommendations on CWIP and Special Request 7, the Public Advocates Office Report and Recommendations on Region 3 Plant, Contingency, and Plant Escalation, and the Public Advocates Office Report and Recommendations on Pipeline Replacement:

1. The Commission should reduce GSWC’s requested contingency rate from 10% to 5% for the following project budget groups: 1) 50 (land and water rights), 2) 51 (water supply), 3) 54 (water quality), and 4) 55 (miscellaneous).
2. The Commission should also reduce GSWC’s proposed company cost escalation factors for individual capital projects from 3.70% to 0% in 2021, 4.10% to 0% in 2022, and 4.30% to 0% in 2023.
3. The Commission should reduce GSWC’s pipeline replacement budget request from \$503,600 to \$454,134 in 2021.
4. The Commission should reduce GSWC’s blanket budget request from \$553,000 to \$452,060 in 2021, \$398,400 to \$385,600 in 2022, and \$489,400 to \$349,400 in 2023.

These recommendations are reflected in the 2021-2023 budget the Commission should adopt as shown in the table below, which compares GSWC’s and Cal Advocates’ recommended plant additions for 2021-2023.

Table 2-1: Proposed Capital Budget – Los Osos RMA

Los Osos (\$000)	2021	2022	2023
Cal Advocates	\$ 946.69	\$ 943.50	\$ 1,737.60
GSWC	\$ 1,007.13	\$ 975.20	\$ 1,955.60
GSWC > Cal Advocates	\$ 60.44	\$ 31.70	\$ 218.00
Cal Advocates as % of GSWC	94%	97%	89%

Table 2-2: GSWC Proposed Capital Budget – Los Osos RMA³⁶

Budget Group	Description	2021 Proposed Budget	2022 Proposed Budget	2023 Proposed Budget
	<i>Los Osos</i>			
51-	Los Osos, Systemwide SCADA	-	-	1,025,500
51-	Systemwide, New Well Study	-	159,400	-
	<i>Edna Road</i>			
51-	Edna Road Plant, Reservoir Improvements	-	417,400	-
	TOTAL WATER SUPPLY	-	576,800	1,025,500
	<i>Los Osos</i>			
53-	Highland Drive to Cabrillo Plant	503,600	-	-
	TOTAL DISTRIBUTION IMPROVEMENTS	503,600	-	-
	<i>Edna Road</i>			
54-	Country Club Plant, Fe/Mn Media Replacement	-	-	231,900
54-	Country Club Plant, Selenium Treatment	-	-	208,800
	TOTAL WATER QUALITY	-	-	440,700
LO, B-01-	Meters	29,400	21,700	38,500
LO, B-02-	Services	34,600	35,100	35,600
LO, B-06-	Main Replacements	66,800	125,500	68,900
LO, B-07-	Main Pumping Plant Equipment	116,900	117,000	118,500
LO, B-08-	Purification Equipment	80,500	81,700	210,200
LO, B-09-	Office Furniture and Equipment	15,300	15,600	15,800
LO, B-10-	Vehicles	181,400	-	-
LO, B-11-	Tools & Safety Equipment	1,800	1,800	1,900
LO, B-12-	Addition to General Structure	26,300	-	-
	TOTAL BLANKETS	553,000	398,400	489,400
	TOTAL NET COST	1,056,600	975,200	1,955,600

Table 2-3: Cal Advocates Capital Budget – Los Osos RMA

³⁶GSWC Capital Projects Lists Workpapers, at pp. 5-6. GSWC provided an updated project cost for the Los Osos, Systemwide SCADA project in response to Public Advocates DR JMI-009.

Budget Group	Description	2021 Recommended Budget	2022 Recommended Budget	2023 Recommended Budget
	Los Osos			
51-	Los Osos, Systemwide SCADA	-	-	961,200
51-	Systemwide, New Well Study	-	150,700	-
	Edna Road			
51-	Edna Road Plant, Reservoir Improvements	-	394,400	-
	TOTAL WATER SUPPLY	-	545,100	961,200
	Los Osos			
53-	Los Osos Pipeline Replacement Budget	454,134	-	-
	TOTAL DISTRIBUTION IMPROVEMENTS	454,134	-	-
	Edna Road			
54-	Country Club Plant, Fe/Mn Media Replacement	-	-	218,000
54-	Country Club Plant, Selenium Treatment	-	-	196,300
	TOTAL WATER QUALITY	-	-	414,300
	<i>Individual Projects Proposed by GSWC that should be Excluded from the Blanket Budget</i>			
	Manzanita Monitoring Plan	14,200	12,800	12,700
	Country Club Treatment Plant PLC Upgrade	-	-	-
	Server Room	26,300	-	-
	TOTAL INDIVIDUAL PROJECTS PROPOSED BY GSWC THAT SHOULD BE EXCLUDED FROM THE BLANKET BUDGET	40,500	12,800	12,700
LO, B-01-	Meters	29,400	21,700	38,500
LO, B-02-	Services	34,600	35,100	35,600
LO, B-06-	Main Replacements	66,800	125,500	68,900
LO, B-07-	Main Pumping Plant Equipment	102,700	104,200	105,800
LO, B-08-	Purification Equipment	80,500	81,700	82,900
LO, B-09-	Office Furniture and Equipment	15,300	15,600	15,800
LO, B-10-	Vehicles	120,960	-	-
LO, B-11-	Tools & Safety Equipment	1,800	1,800	1,900
LO, B-12-	Addition to General Structure	-	-	-
	TOTAL BLANKETS	452,060	385,600	349,400
	TOTAL NET COST	946,694	943,500	1,737,600

III. Discussion

A. Adjustments to Cost Add-ons

The Commission should reduce the proposed contingency rate from 10% to 5% for the following project budget groups: 1) 50 (land and water rights), 2) 51 (water supply), 3) 54 (water quality), and 4) 55 (miscellaneous). The reduction in the

contingency rate for the aforementioned project budget groups reflects Cal Advocates' general recommendations regarding contingency applicable to all RMAs.³⁷

The Commission should also reduce the proposed company cost escalation factors³⁸ for individual capital projects from 3.70% to 0% in 2021, 4.10% to 0% in 2022, and 4.30% to 0% in 2023, consistent with Cal Advocates' general recommendations regarding escalation rates applicable to all RMAs.³⁹

Cal Advocates' recommendations regarding contingency and escalation rates reduce the project budget for the proposed projects. The table below shows the project costs the Commission should adopt for the projects where the only recommended adjustments are related to the revised contingency, escalation rates, or both.

Table 2-4: Cal Advocates Recommended Project Budgets Where Only Recommended Adjustments are Related to Contingency, Escalation, or Both – Los Osos RMA

Project Name	Budget Group	Proposed Project Cost	Adjusted Project Cost
Los Osos, Systemwide SCADA	51	\$ 1,025,500	\$ 961,200
Systemwide, New Well Study	51	\$ 159,400	\$ 150,700
Edna Road Plant, Reservoir Improvements	54	\$ 417,400	\$ 394,400
Country Club Plant, Fe/Mn Media Replacement	54	\$ 231,900	\$ 218,000
Country Club Plant, Selenium Treatment	54	\$ 208,800	\$ 196,300

B. Pipeline Replacement Budget

The Commission should reduce the proposed pipeline replacement budget from \$503,600 to \$454,134 in 2021, consistent with Cal Advocates' recommendations regarding pipeline replacement projects.⁴⁰

C. CWIP Projects

³⁷ Public Advocates Office Report and Recommendations on Region 3 Plant, Contingency, and Plant Escalation.

³⁸ In GSWC's RO Model (workpaper: SEC-51_RB_FDR Capital Budget, tab: Project List – DO NOT SORT!), GSWC applies the company cost escalation factors to the project's design cost.

³⁹ Public Advocates Office Report and Recommendations on Region 3 Plant, Contingency, and Plant Escalation.

⁴⁰ Public Advocates Office Report and Recommendations on Pipeline Replacement.

1 In the Prepared Testimony of Elizabeth V. McDonough and Dane T. Sinagra
2 (GSWC CWIP Testimony), GSWC requests additional funding for the purpose of
3 “closing and completing its capital projects that are currently booked in the Company’s
4 CWIP account.”⁴¹ As described by GSWC, these projects fall into one of the following
5 categories:

6 Category 1 – Blankets

7 Category 2 – New Business Projects

8 Category 3 – Project Funded by Others

9 Category 4 – Projects Approved in the Previous GRC

10 Category 5 – Projects Not Submitted in a GRC

11 Category 6 – Projects Denied in the Previous GRC

12 The GSWC CWIP Testimony provides a detailed description of the CWIP
13 categories.⁴² The CWIP project budget reduction reflects Cal Advocates’
14 recommendations regarding CWIP projects in the Los Osos RMA.⁴³

15 D. Blanket Budget

16 The Commission should reduce GSWC’s request of \$553,000 to \$452,060 for the
17 2021 blanket budget due to 1) reducing the 2021 vehicles blanket group budget and 2)
18 separating the project costs where GSWC is requesting two projects in 2021 through the
19 blanket budget, as discussed in Chapter 1 of this report. The Commission should reduce
20 the 2021 vehicles blanket group budget from \$181,400 to \$120,960 because one of the
21 proposed vehicles (Vehicle 70595) does not need to be replaced at this time.

22 The individual projects GSWC proposes to be funded through the blanket budget
23 should be recorded as separate line items instead of being included in the blanket budget.

⁴¹ GSWC CWIP Testimony, at p. 2.

⁴² GSWC CWIP Testimony, at pp. 5-81.

⁴³ Public Advocates Office Report and Recommendations on CWIP and Special Request 7.

1 These projects include: 1) Manzanita Monitoring Plan (2021-2023); 2) Country Club
2 Treatment Plant PLC Upgrade project (2023); and 3) Server Room project (2021).⁴⁴

3 The Commission should also reduce GSWC's request of \$398,400 to \$385,600 for
4 the 2022 blanket budget due to separating the project costs where GSWC is requesting
5 one project (2022 portion of the Manzanita Monitoring Plan) through the blanket budget.

6 The Commission should also reduce GSWC's request of \$489,400 to \$349,400 for
7 the 2023 blanket budget due to separating the project costs where GSWC is requesting
8 two projects (2023 portion of the Manzanita Monitoring Plan and the Country Club
9 Treatment Plant PLC Upgrade project) through the blanket budget. The Commission
10 should not allow funding for the proposed upgrade of the PLCs at the Country Club
11 Treatment Plant; this would remove the duplicative requests to upgrade the existing
12 PLCs, preventing double recovery. These blanket budget reductions reflects Cal
13 Advocates' recommendations regarding the proposed blanket budget, as discussed in
14 Chapter 1 of this report.

15 **IV. Conclusion**

16 The Commission should make the following adjustments to GSWC's requests for
17 the Los Osos RMA:

- 18 1. Allow the following project budgets due to a reduction in contingency rate,
19 escalation rates, or both:
 - 20 a. Los Osos, Systemwide SCADA – \$961,200.
 - 21 b. Systemwide, New Well Study – \$150,700.
 - 22 c. Edna Road Plant, Reservoir Improvements – \$394,400.
 - 23 d. Country Club Plant, Fe/Mn Media Replacement – \$218,000.
 - 24 e. Country Club Plant, Selenium Treatment – \$196,300.
- 25 2. Allow \$454,134 in 2021 for the pipeline replacement budget.

⁴⁴ The total project cost for the aforementioned individual projects is \$193,300 for 2021-2023. Cal Advocates does not oppose the Manzanita Monitoring Plan and Server Room projects.

3. Allow \$452,060 in 2021, \$385,600 in 2022, and \$349,400 in 2023 for the annual blanket budget.
4. Reject GSWC's request for funding the proposed Country Club Treatment Plant PLC Upgrade project originally requested to be funded through the blanket budget.

[END OF CHAPTER]

CHAPTER 3: PLANT – SANTA MARIA

I. Introduction

Cal Advocates recommends adjustments to GSWC's capital budget requests for the Santa Maria RMA, which consists of the following water systems: Cypress Ridge, Lake Marie, Nipomo, Orcutt, Sisquoc, and Tanglewood.

II. Summary of Recommendations

The Commission should adjustment GSWC's requests for individual proposed projects in the Santa Maria RMA, as follows:

1. Deny the Casa Real Well #1, Well Improvements project since the well does not need to be rehabilitated and the pump does not need to be replaced.
2. No funding should be allowed for the Systemwide, Replacement Well Land Acquisition and Systemwide, Replacement Well projects. GSWC can choose to build a new well and then seek cost recovery in a future rate case when the new well is built. The Commission can then determine if the new well is necessary, prudent, and used and useful before granting cost recovery.
3. Deny the Cypress Ridge Plant, Replace Reservoir #2 project because there is adequate storage in the Cypress Ridge pressure zone.

The Commission should also adjust GSWC's requests related to Cal Advocates' recommendations for common plant issues in the Santa Maria RMA, as discussed in full in Chapter 1 of this report, the Public Advocates Office Report and Recommendations on CWIP and Special Request 7, the Public Advocates Office Report and Recommendations on Region 3 Plant, Contingency, and Plant Escalation, and the Public Advocates Office Report and Recommendations on Pipeline Replacement:

1. The Commission should reduce the proposed contingency rate from 10% to 5% for the following project budget groups: 1) 50 (land and water rights), 2) 51 (water supply), 3) 54 (water quality), and 4) 55 (miscellaneous).

2. The Commission should also reduce the proposed company cost escalation factors for individual capital projects from 3.70% to 0% in 2021, 4.10% to 0% in 2022, and 4.30% to 0% in 2023.
3. The Commission should reduce GSWC’s pipeline replacement budget request from \$2,238,000 to \$1,734,386 in 2021, \$2,697,000 to \$2,293,148 in 2022, and \$238,300 to \$198,212 in 2023.
4. The Commission should reduce GSWC’s blanket budget request of \$2,648,600 to \$2,465,230 in the 2021-2022 period due to reducing the vehicles blanket group budget.

These recommendations are reflected in the 2021-2023 budget the Commission should adopt as shown in the table below, which compares GSWC’s and Cal Advocates’ recommended plant additions for 2021-2023.

Table 3-1: Proposed Capital Budget – Santa Maria RMA

Santa Maria (\$000)	2021	2022	2023
Cal Advocates	\$2,977.39	\$4,273.47	\$3,832.11
GSWC	\$4,576.80	\$4,844.30	\$6,182.10
GSWC > Cal Advocates	\$1,599.41	\$ 570.83	\$2,349.99
Cal Advocates as % of GSWC	65%	88%	62%

Table 3-2: GSWC Capital Budget – Santa Maria RMA⁴⁵

⁴⁵ GSWC Capital Projects Lists Workpapers, at pp. 7-8. GSWC provided an updated project cost for the Santa Maria, Systemwide SCADA project in response to Public Advocates DR JMI-009.

Budget Group	Description	2021 Proposed Budget	2022 Proposed Budget	2023 Proposed Budget
	<i>Cypress Ridge</i>			
50-	Systemwide, Replacement Well Land Acquisition	484,400	-	-
	TOTAL LAND AND WATER RIGHTS	484,400	-	-
	<i>Lake Marie</i>			
51-	Vineyard Well #6, Well Improvements	-	-	524,700
51-	Lake Marie Plant, Booster C and Generator	-	553,900	-
	<i>Orcutt</i>			
51-	Kenneth Plant, Disinfection Facilities	-	126,100	-
51-	Woodmere Plant, Disinfection Facilities	-	122,200	-
51-	Crescent Well #1, Site Improvements	-	-	470,000
	<i>Nipomo</i>			
51-	Casa Real Well #1, Well Improvements	487,300	-	-
	<i>Cypress Ridge</i>			
51-	Systemwide, Replacement Well	-	-	1,718,700
51-	Cypress Ridge Plant, Replace Reservoir #2	63,600	-	433,500
51-	El Campo Plant, Replace Reservoir #2	-	-	487,000
	<i>Santa Maria</i>			
51-	Santa Maria, Systemwide SCADA	-	-	969,900
	TOTAL WATER SUPPLY	550,900	802,200	4,603,800
	<i>Orcutt</i>			
53-	Orcutt Patterson Zone, Transmission Main	2,238,000	-	-
53-	Orcutt Rd & Clark Ave	-	2,131,300	-
53-	Orcutt Rd Hobbs to Ross	-	-	238,300
53-	Valley View & Rice Ranch Rd	-	534,100	-
	<i>Tanglewood</i>			
53-	Valve Installation on T-main to Jail	-	31,600	-
	TOTAL DISTRIBUTION IMPROVEMENTS	2,238,000	2,697,000	238,300
	<i>Cypress Ridge</i>			
54-	Systemwide, Disinfection Residual SM CR	-	-	132,900
	TOTAL WATER QUALITY	-	-	132,900
SM, B-01-	Meters	164,900	156,100	187,400
SM, B-02-	Services	333,200	338,200	343,300
SM, B-06-	Main Replacements	153,800	156,100	158,400
SM, B-07-	Main Pumping Plant Equipment	436,300	442,900	449,500
SM, B-08-	Purification Equipment	14,700	14,900	15,200
SM, B-09-	Office Furniture and Equipment	47,100	47,800	48,500
SM, B-10-	Vehicles	148,800	184,300	-
SM, B-11-	Tools & Safety Equipment	4,700	4,800	4,800
	TOTAL BLANKETS	1,303,500	1,345,100	1,207,100
	TOTAL NET COST	4,576,800	4,844,300	6,182,100

Table 3-3: Cal Advocates Capital Budget – Santa Maria RMA

Budget Group	Description	2021 Recommended Budget	2022 Recommended Budget	2023 Recommended Budget
	<i>Cypress Ridge</i>			
50-	Systemwide, Replacement Well Land Acquisition	-	-	-
	TOTAL LAND AND WATER RIGHTS	-	-	-
	<i>Lake Marie</i>			
51-	Vineyard Well #6, Well Improvements	-	-	493,200
51-	Lake Marie Plant, Booster C and Generator	-	523,500	-
	<i>Orcutt</i>			
51-	Kenneth Plant, Disinfection Facilities	-	119,100	-
51-	Woodmere Plant, Disinfection Facilities	-	115,500	-
51-	Crescent Well #1, Site Improvements	-	-	441,700
	<i>Nipomo</i>			
51-	Casa Real Well #1, Well Improvements	-	-	-
	<i>Cypress Ridge</i>			
51-	Systemwide, Replacement Well	-	-	-
51-	Cypress Ridge Plant, Replace Reservoir #2	-	-	-
51-	El Campo Plant, Replace Reservoir #2	-	-	457,700
	<i>Santa Maria</i>			
51-	Santa Maria, Systemwide SCADA	-	-	909,300
	TOTAL WATER SUPPLY	-	758,100	2,301,900
	<i>Santa Maria</i>			
53-	Santa Maria Pipeline Replacement Budget	1,734,386	2,293,148	198,212
	TOTAL DISTRIBUTION IMPROVEMENTS	1,734,386	2,293,148	198,212
	<i>Cypress Ridge</i>			
54-	Systemwide, Disinfection Residual SM CR	-	-	124,900
	TOTAL WATER QUALITY	-	-	124,900
SM, B-01-	Meters	164,900	156,100	187,400
SM, B-02-	Services	333,200	338,200	343,300
SM, B-06-	Main Replacements	153,800	156,100	158,400
SM, B-07-	Main Pumping Plant Equipment	436,300	442,900	449,500
SM, B-08-	Purification Equipment	14,700	14,900	15,200
SM, B-09-	Office Furniture and Equipment	47,100	47,800	48,500
SM, B-10-	Vehicles	88,305	61,425	-
SM, B-11-	Tools & Safety Equipment	4,700	4,800	4,800
	TOTAL BLANKETS	1,243,005	1,222,225	1,207,100
	TOTAL NET COST	2,977,391	4,273,473	3,832,112

III. Discussion

A. Proposed Projects

1. Nipomo – Casa Real Well #1, Well Improvements

1 The Commission should reject GSWC's request to include \$487,300 in its plant
2 budget request for 2021 to rehabilitate the existing Casa Real Well #1 because the well
3 does not need to be rehabilitated at this time, and the current pump does not need to be
4 replaced.

5 GSWC requests to rehabilitate the existing well, which includes replacement of
6 the existing pump.⁴⁶ To support its request to rehabilitate the well, GSWC references an
7 engineering memo from Water Infrastructure and Management Solution (WIMS) on the
8 well's proposed improvements.⁴⁷ The memo states that there is no record of the Casa
9 Real Well #1 being rehabilitated in the past⁴⁸ and GSWC requests to rehabilitate the well
10 as described in the engineering memo.⁴⁹ However, in response to Cal Advocates' request
11 regarding whether the well had been rehabilitated, GSWC revealed that the Casa Real
12 Well #1 has been cleaned, brushed, and treated in March 2018, after the WIMS report
13 was conducted in 2017.⁵⁰ The proposed rehabilitation for Casa Real Well #1 is scheduled
14 for 2021.⁵¹ In the proposed project cost estimate, there is funding allocated to brushing,
15 chemical treatment, and dual swabbing the well.⁵² Because the well was already cleaned,
16 brushed, and treated in 2018, the well does not require rehabilitation at this time.

17 The Commission should also reject the portion of requested project costs related to
18 replacing the well's pump, as recent test results establish that the pump is in good
19 working condition. WIMS's engineering memo states that the current pump is 16 years
20 old and would need to be replaced soon;⁵³ thus, a portion of GSWC's proposed project

⁴⁶ GSWC Capital Testimony, at p. 85. GSWC Capital Testimony, Attachment SM01, at p. 1.

⁴⁷ GSWC Capital Testimony, at p. 85.

⁴⁸ GSWC Capital Testimony, Attachment SM01, at p. 1.

⁴⁹ GSWC Capital Testimony, at p. 85.

⁵⁰ Attachment 3-1, GSWC Response to Public Advocates DR JMI-002, Q.2.

⁵¹ GSWC Capital Testimony, at p. 85.

⁵² GSWC RO Model, workpaper: PCE_RI – Nipomo (Casa Real Well 1, Well Improvements), tab: Construction Cost.

⁵³ GSWC Capital Testimony, Attachment SM01, at p. 1.

1 cost includes the cost to replace the pump.⁵⁴ However, in response to Cal Advocates’
2 request, GSWC provided the latest pump test report for Casa Real Well #1.⁵⁵ The current
3 pump efficiency for the Casa Real Well #1 is an average of approximately 68.6%,⁵⁶
4 which equates to a “good” pump efficiency by Commission standards.⁵⁷ Therefore, the
5 existing pump does not need to be replaced at this time. Because the well does not need
6 to be rehabilitated and the current pump does not need to be replaced, the Commission
7 should deny funding for the requested project.

8 2. Cypress Ridge – Systemwide, Replacement Well Land Acquisition and
9 Replacement Well

10 The Commission should reject GSWC’s request for \$2,203,100 to construct a new
11 well.⁵⁸

12 GSWC requests funding for an additional well (including land for a well site) to
13 meet system demand and address nitrate levels in the service area.⁵⁹ The proposed well
14 project is unnecessary for the following reasons: 1) the Cypress Ridge system has
15 sufficient source supply and 2) GSWC has not demonstrated that a replacement well is
16 more cost effective than installing nitrate treatment at the current facilities when taking
17 into consideration updated project costs and potential additional costs due to the future
18 well site.

19 The current Cypress Ridge system has enough source supply to meet system
20 demand. The California Waterworks Standards states that public water systems shall
21 have the capacity to meet the system’s maximum day demand (MDD).⁶⁰ GSWC Cypress
22 Ridge Water Master Plan states that the Cypress Ridge system has a total well capacity of

⁵⁴ GSWC RO Model, workpaper: PCE_RI – Nipomo (Casa Real Well 1, Well Improvements).

⁵⁵ Attachment 3-1, GSWC Response to Public Advocates DR JMI-002, Q.1.b.

⁵⁶ Attachment 3-1, GSWC Response to Public Advocates DR JMI-002, Q.1.b.

⁵⁷ Standard Practice U-3-SM, at p. 7.

⁵⁸ GSWC Capital Testimony, at pp. 88-90.

⁵⁹ GSWC Capital Testimony, at p. 89.

⁶⁰ California Code of Regulations, Title 22, Division 4, Chapter 16, Article 2, Section 64554 (a) (1).

1 1,140 gallons per minute (gpm).⁶¹ The GSWC Cypress Ridge Water Master Plan
2 confirms that the current Cypress Ridge system has sufficient supply capacity to meet
3 both MDD and peak hour demand (PHD) of 591 gpm and 887 gpm, respectively.⁶²

4 GSWC also has not demonstrated that a replacement well is more cost effective
5 than installing nitrate treatment at the current facilities, particularly when taking into
6 consideration updated project costs and potential costs due to the location of the new well
7 site. GSWC references the Cypress Ridge Water Reliability Study, stating that a
8 replacement well should be considered over nitrates treatment.⁶³ However, the cost of a
9 replacement well in the reliability study is misleading. The reliability study states that
10 the cost for a replacement well is approximately \$1.5 million.⁶⁴ An updated cost estimate
11 for a replacement well in 2023 is \$1,718,700.⁶⁵ But this cost does not include the cost of
12 acquiring land for the new well. GSWC acknowledges that land would have to be
13 acquired for a new well by requesting an additional \$484,400 in this rate case to purchase
14 land for the new well site.⁶⁶

15 In addition to failing to incorporate updated project costs and the cost of land
16 acquisition, GSWC's estimated cost of \$1,718,700 for a replacement well assumes that
17 the well would not require nitrate treatment.⁶⁷ However, GSWC states that all of the
18 wells in the Cypress Ridge system are affected by high nitrates.⁶⁸ Because the current
19 wells have high nitrate levels, it is likely that treatment is needed when the replacement is
20 placed into service. GSWC states that site specific assessments would be required to

⁶¹ GSWC Cypress Ridge Water Master Plan, at p. 5-5.

⁶² GSWC Cypress Ridge Water Master Plan, at pp. 5-7, 5-8, and 5-9.

⁶³ GSWC Capital Testimony, at p. 89.

⁶⁴ GSWC Capital Testimony, Attachment SM03, GSWC Cypress Ridge System Water Reliability Study, at p. 68 (Cypress Ridge Water Reliability Study).

⁶⁵ GSWC Capital Testimony, at p. 89.

⁶⁶ GSWC Capital Testimony, at p. 88.

⁶⁷ GSWC RO Model, workbook: PCE_RI – Cypress Ridge (Systemwide, Replacement Well), tab: Construction Cost.

⁶⁸ GSWC Capital Testimony, at p. 89.

1 determine any future well site.⁶⁹ GSWC also mentions that it is currently testing test
2 wells for potential future well sites.⁷⁰ To prevent stranding costs, no funding should be
3 allowed for a well site until the test well results demonstrate favorable water quality.

4 Previously, customers in the Los Oso RMA funded a well over multiple rate cases
5 in the past without receiving any corresponding benefit. In GSWC's 2011 rate case,
6 GSWC requested to install a new well, Edna Well, for the Edna Road system in the Los
7 Osos RMA.⁷¹ GSWC originally planned to obtain a new well site in 2012.⁷² Both the
8 acquisition of land for the well site and the construction of the well were funded in
9 customer rates. In the 2014 rate case, GSWC stated that the project was delayed but
10 expected to obtain the well site in 2014 and complete the well in 2015.⁷³ In the 2017 rate
11 case, GSWC stated that the project was delayed but expected to be completed in 2019.⁷⁴
12 In this rate case, GSWC states that all the test wells for the Edna Well project have
13 resulted in a combination of poor water quality or production.⁷⁵ Because of these
14 outcomes, GSWC is changing its approach in finding a suitable well site by proposing
15 ratepayers fund a well study in this rate case.⁷⁶ However, GSWC customers funded the
16 Edna Well project (including land) over multiple rate cases but received no benefit.
17 Therefore, no funding should be provided for a new well. The utility can choose to build
18 a new well and then seek cost recovery in a future rate case when the new well is built.
19 The Commission can then determine if the new well is necessary, prudent, and used and

⁶⁹ GSWC Capital Testimony, at p. 89.

⁷⁰ GSWC CWIP Testimony, at p. 48.

⁷¹ Prepared Testimony of Ernest Gisler, Adrian Combes, Mark Insko, and Dane Sinagra (from A.11-07-017), at pp. 85-88.

⁷² GSWC TY 2013 GRC D.13-05-011, at p. 51. The Edna Well was first authorized in D.13-05-011, adopting the 2011 GRC Settlement Agreement.

⁷³ GSWC TY 2016 GRC D. 16-12-067, Adopted GSWC 2014 Settlement Agreement, Appendix E.

⁷⁴ GSWC RO Model, workbook: CWIP123116 Asset mngmnt ALL, tab: CWIP – Details (from A.17-07-010).

⁷⁵ GSWC CWIP Testimony, at p. 46.

⁷⁶ GSWC Capital Testimony, at p. 69.

1 useful before granting cost recovery. This after the fact review protects ratepayers by
2 ensuring costs included in rates deliver the corresponding benefits.

3 3. Cypress Ridge – Cypress Ridge Plant, Replace Reservoir #2

4 The Commission should reject GSWC's request for \$497,100⁷⁷ to replace the
5 existing Cypress Ridge Reservoir #2 because there is sufficient storage in this pressure
6 zone without the existing Cypress Ridge Reservoir #2. The Cypress Ridge Reservoir #2
7 has a storage volume of 0.275 million gallons (MG).⁷⁸ The total storage volume in the
8 current Cypress Ridge pressure zone is approximately 0.55 MG.⁷⁹ The Cypress Ridge
9 pressure zone would have a storage capacity of 0.275 MG if the storage capacity from
10 Cypress Ridge Reservoir #2 was excluded ($0.55 \text{ MG} - 0.275 \text{ MG} = 0.275 \text{ MG}$). GSWC
11 states that the current storage requirement is approximately 0.182 MG for the Cypress
12 Ridge pressure zone,⁸⁰ which provides surplus storage of 0.093 MG ($0.275 \text{ MG} - 0.182$
13 MG). Even without the storage volume from Cypress Ridge Reservoir #2, there is
14 adequate storage to meet the storage demand in the Cypress Ridge pressure zone.
15 Therefore, the Commission should deny GSWC's request for this project.

16 B. Adjustments to Cost Add-ons

17 In addition to the project-specific recommendations listed above, the Commission
18 should adopt project budgets that reflect more reasonable estimates of contingency rates
19 and escalation factors, as described in the Public Advocates Office Report and
20 Recommendations on Region 3 Plant, Contingency, and Plant Escalation. The
21 Commission should reduce the proposed contingency rate from 10% to 5% for the
22 following project budget groups: 1) 50 (land and water rights), 2) 51 (water supply), 3)

⁷⁷ GSWC Capital Testimony, at p. 86. GSWC is requesting the direct cost of the project (\$63,600) in 2021 and the construction portion of the project (\$433,500) in 2023.

⁷⁸ Cypress Ridge Water Master Plan, at p. 5-6.

⁷⁹ Cypress Ridge Water Master Plan, at p. 5-6.

⁸⁰ Cypress Ridge Water Master Plan, at p. 5-11.

54 (water quality), and 4) 55 (miscellaneous). Cal Advocates’ recommended budget utilizes 5% contingency rate.⁸¹

The Commission should also reduce the proposed company cost escalation factors⁸² from 3.70% to 0% in 2021, 4.10% to 0% in 2022, and 4.30% to 0% in 2023, consistent with Cal Advocates’ general recommendations regarding escalation rates.⁸³

Cal Advocates’ recommendations regarding contingency and escalation rates reduce the budget for the proposed projects. The table below shows the costs the Commission should adopt for the projects where the only recommended adjustments are related to the revised contingency rate, escalation rate, or both.

Table 3-5: Cal Advocates Recommended Project Budgets Where Only Recommended Adjustments are Related to Contingency, Escalation, or Both – Santa Maria RMA

Project Name	Budget Group	Proposed Project Cost	Adjusted Project Cost
Vineyard Well #6, Well Improvements	51	\$ 524,700	\$ 493,200
Lake Marie Plant, Booster C and Generator	51	\$ 553,900	\$ 523,500
Santa Maria, Systemwide SCADA	51	\$ 969,900	\$ 909,300
Kenneth Plant, Disinfection Facilities	51	\$ 126,100	\$ 119,100
Woodmere Plant, Disinfection Facilities	51	\$ 122,200	\$ 115,500
Crescent Well #1, Site Improvements	51	\$ 470,000	\$ 441,700
El Campo Plant, Replace Reservoir #2	51	\$ 487,000	\$ 457,700
Systemwide, Disinfection Residual SM CR	54	\$ 132,900	\$ 124,900

C. Pipeline Replacement Budget

The Commission should reduce the proposed pipeline replacement budget from \$2,238,000 to \$1,734,386 in 2021, \$2,697,000 to \$2,293,148 in 2022, and \$238,300 to

⁸¹ Public Advocates Office Report and Recommendations on Region 3 Plant, Contingency, and Plant Escalation.

⁸² In GSWC’s RO Model (workpaper: SEC-51_RB_FDR Capital Budget, tab: Project List – DO NOT SORT!), GSWC applies the company cost escalation factors to the project’s design cost.

⁸³ Public Advocates Office Report and Recommendations on Region 3 Plant, Contingency, and Plant Escalation.

1 \$198,212 in 2023, consistent with Cal Advocates’ recommendations regarding pipeline
2 replacement projects.⁸⁴

3 D. CWIP Projects

4 In the GSWC CWIP Testimony, GSWC requests additional funding for the
5 purpose of “closing and completing its capital projects that are currently booked in the
6 Company’s CWIP account.”⁸⁵ As described by GSWC, these projects fall into one of the
7 following categories:

8 Category 1 – Blankets

9 Category 2 – New Business Projects

10 Category 3 – Project Funded by Others

11 Category 4 – Projects Approved in the Previous GRC

12 Category 5 – Projects Not Submitted in a GRC

13 Category 6 – Projects Denied in the Previous GRC

14 The GSWC CWIP Testimony provides a detailed description of the CWIP
15 categories.⁸⁶ The reduction in the CWIP project budget reflects the Cal Advocates’
16 recommendations regarding CWIP projects in the Santa Maria RMA.⁸⁷

17 E. Blanket Budget

18 The Commission should reduce GSWC’s blanket budget request of \$2,648,600 to
19 \$2,465,230 in the 2021-2022 period due to reducing the vehicles blanket group budget.
20 The Commission should reduce the total 2021-2022 vehicles blanket group budget from
21 \$333,100 to \$149,730 because three of the proposed vehicles (Vehicles 500420, 500827,
22 and 504651)⁸⁸ do not need to be replaced at this time, as discussed in Chapter 1 of this
23 report. Cal Advocates’ recommendations regarding reducing the proposed blanket
24 budget are discussed in Chapter 1 of this report.

⁸⁴ Public Advocates Office Report and Recommendations on Pipeline Replacement.

⁸⁵ GSWC CWIP Testimony, at p. 2.

⁸⁶ GSWC CWIP Testimony, at pp. 5-81.

⁸⁷ Public Advocates Office Report and Recommendations on CWIP and Special Request 7.

⁸⁸ The total cost of the three vehicles is \$183,370 for 2021-2022.

1 IV. Conclusion

The Commission should make the following adjustments to GSWC's requests for the Santa Maria RMA:

1. Deny the Casa Real Well #1, Well Improvements project since the well does not need to be rehabilitated and the pump does not need to be replaced.
2. No funding should be allowed for the Systemwide, Replacement Well Land Acquisition and Systemwide, Replacement Well projects. GSWC can choose to build a new well and then seek cost recovery in a future rate case when the new well is built. The Commission can then determine if the new well is necessary, prudent, and used and useful before granting cost recovery.
3. Deny the Cypress Ridge Plant, Replace Reservoir #2 project because there is adequate storage in the Cypress Ridge pressure zone.
4. Adjust contingency rate, escalation rate, or both for the following projects:
 - a. Vineyard Well #6, Well Improvements – \$493,200
 - b. Lake Marie Plant, Booster C and Generator – \$523,500
 - c. Santa Maria, Systemwide SCADA – \$909,300
 - d. Kenneth Plant, Disinfectant Facilities – \$119,100
 - e. Woodmere Plant, Disinfection Facilities – \$115,500
 - f. Crescent Well #1, Site Improvements – \$441,700
 - g. El Campo Plant, Replace Reservoir #2 – \$457,700
 - h. Systemwide, Disinfection Residual SM CR – \$124,900
5. Allow \$1,734,386 in 2021, \$2,293,148 in 2022, and \$198,212 in 2023 for the pipeline replacement budget.
6. Allow \$1,243,005 in 2021, \$1,222,225 in 2022, and \$1,207,100 in 2023 for the annual blanket budget.

[END OF CHAPTER]

CHAPTER 4: CUSTOMER SERVICE

I. Introduction

GO 103-A adopted reporting requirements and standards for six customer service quality metrics, which include: 1) telephone performance standards; 2) billing performance standards; 3) meter reading performance standard; 4) work completion performance standards; 5) response to customer and regulatory complaints performance standard; and 6) service interruptions.⁸⁹ Class A and B utilities report their compliance with these standards in their annual reports.⁹⁰ The Commission should hold GSWC accountable to these standards to ensure GSWC customers are receiving quality customer service. This chapter presents GSWC's customer service performance companywide from 2015 to 2019, reviewing compliance with GO 103-A standards, the Commission's Consumer Affairs Branch (CAB) complaints, and customer inquiries to GSWC.

II. Summary of Recommendations

The Commission should adopt the following recommendations to improve GSWC's customer service quality and compliance with GO 103-A standards:

1. GSWC should increase the rate of answering customer calls within 30 seconds (during normal business hours) after requesting to speak with a CSR above the standard of at least 80% established in GO 103-A.
2. GSWC should continue to reduce its rate of scheduled appointments missed within the company's control below the standard of no more than 5% established in GO 103-A.

III. Discussion

A. GO 103-A Compliance

⁸⁹ General Order 103-A, Appendix E.

⁹⁰ Class A and B Water Utilities do not report on service interruptions annually but must retain a complete record of interruptions.

1 GO 103-A requires annual reporting on performance on customer service quality
2 standards. GSWC, in general, has met most of the reporting standards highlighted in
3 Appendix E of GO 103-A. GSWC's GO 103-A performance for the past five years
4 (2015-2019) is shown in the table in Attachment 4-1⁹¹ of this report.⁹² There are two
5 areas where GSWC fails to comply with GO 103-A: 1) percentage of customers reaching
6 a utility representative within 30 seconds (during normal business hours) after requesting
7 to speak with a CSR in 2015, 2017-2019 and 2) percentage of missed scheduled
8 appointments in 2018.

9 GSWC's ability to answer customer calls within 30 seconds (during business
10 hours) is measured by dividing the number of calls reaching a utility representative
11 within 30 seconds by the number of attempts to reach a utility representative.⁹³ GSWC
12 has not been consistent in answering customer calls within 30 seconds (during normal
13 business hours) after requesting to speak with a CSR in the past five years (2015-2019).
14 In the past five years, GSWC did not meet the GO 103-A standard of at least 80%⁹⁴ in
15 2015, and 2017-2019.⁹⁵ GSWC's ability to answer customer calls within 30 seconds was
16 76.73% in 2015, 76.73% in 2017, 78.46% in 2018, and 75.25% in 2019.⁹⁶ GSWC needs
17 to improve its performance to meet the call answer performance measure to the standard
18 of at least 80% outlined in GO 103-A.

19 GSWC provided an explanation of why they were unable to meet the 80% metric
20 in 2015 in a report regarding improving customer service from July 2015 through
21 December 2015.⁹⁷ GSWC states that its inability in 2015 to answer customer calls within

⁹¹ Attachment 4-1, GSWC's GO 103-A Performance from 2015-2019.

⁹² Attachment 4-2, GSWC Response to Public Advocates DR PLY-007. GO 103-A, Appendix E.

⁹³ GO 103-A, Appendix E, at p.1.

⁹⁴ GO 103-A, Appendix E, at p. 1.

⁹⁵ Attachment 4-2, GSWC Response to Public Advocates DR PLY-007, Q.1.

⁹⁶ Attachment 4-1, GSWC's GO 103-A Performance from 2015-2019.

⁹⁷ Attachment 4-3, GSWC Measures to Improve Customer Service July 2015 through December 2015 report, dated April 1, 2016, at p. 5 (GSWC Measures to Improve Customer Service Report (July 2015-Dec. 2015)).

1 30 seconds (during normal business hours) after a customer's request to speak with a
2 CSR occurred during May 2015 through July 2015 during the highest monthly call
3 volumes for the year.⁹⁸ GSWC states that it experienced a higher call volume in
4 comparison with the same time period in 2014 due to customers' response to notifications
5 regarding the state-wide drought restrictions and water conservation targets.⁹⁹ GSWC's
6 customer service center (CSC) utilized temporary CSRs to fill vacancies. GSWC states
7 that this provided CSC the flexibility to quickly change the CSR staff's schedule to be
8 able to handle the fluctuations in call volume and be able to handle customer calls
9 regarding the drought.¹⁰⁰ Due to this change, GSWC states that it was able to reach the
10 80% metric after July 2015.¹⁰¹ GSWC also authored similar reports for 2016, 2017,
11 2018, and 2019.¹⁰² However, GSWC does not provide an explanation on why it was not
12 able to meet the 80% metric in 2017, 2018, and 2019.

13 GSWC's missed scheduled appointment rate is measured by dividing the number
14 of missed scheduled appointments (within GSWC's control) by the number of scheduled
15 appointments.¹⁰³ GSWC did not meet the 5% requirement in 2018 for missed scheduled
16 appointments that are under the utility's control; GSWC's missed scheduled appointment

⁹⁸ Attachment 4-3, GSWC Measures to Improve Customer Service Report (July 2015- Dec. 2015), at p. 5.

⁹⁹ Attachment 4-3, GSWC Measures to Improve Customer Service Report (July 2015- Dec. 2015), at p. 5.

¹⁰⁰ Attachment 4-3, GSWC Measures to Improve Customer Service Report (July 2015- Dec. 2015), at p. 5.

¹⁰¹ Attachment 4-3, GSWC Measures to Improve Customer Service Report (July 2015- Dec. 2015), at p. 5.

¹⁰² GSWC Response to Public Advocates Data Request JMI-015. GSWC provided the following reports in response to the data request: 1) GSWC Measures to Improve Customer Service January 2016 through June 2016 report, dated October 1, 2016; 2) GSWC Measures to Improve Customer Service July 2016 through December 2016 report, dated April 1, 2017; 3) GSWC Measures to Improve Customer Service January 2017 through June 2017 report, dated October 1, 2017; 4) GSWC Measures to Improve Customer Service July 2017 through December 2017 report, dated April 1, 2018; 5) GSWC Measures to Improve Customer Service January 2018 through June 2018 report, dated October 1, 2018; 6) GSWC Measures to Improve Customer Service January 2018 to December 2018 report, dated April 1, 2019; 7) GSWC Measures to Improve Customer Service January 2019 through June 2019 report, dated October 1, 2019; and 8) GSWC Measures to Improve Customer Service January 2019 to December 2019 report, dated April 30, 2020.

¹⁰³ GO 103-A, Appendix E, at p. 4.

1 rate in 2018 was 7.51%.¹⁰⁴ GSWC did not provide an explanation on why it was not able
2 to meet the 5% metric in 2018.¹⁰⁵ However, in 2019, GSWC reduced the rate of missed
3 scheduled appointments below 5%. GSWC should continue to improve its performance
4 to consistently keep the rate of the missed scheduled appointments below 5%.

5 GO 103-A does not have punitive measures for utilities who fail to meet the
6 performance standards. If the Commission decides to implement a system of
7 ramifications for failing to meet performance standards, then this should be handled in an
8 industry-wide proceeding.

9 B. Customer Contacts Received by CAB

10 The Commission's CAB is responsible for assisting consumers with their
11 questions and informally resolving disputes regarding billing and service matters with
12 utility providers regulated by the CPUC.¹⁰⁶ Cal Advocates reviewed the number of
13 contacts received by the CAB from GSWC customers during the last five years (2015-
14 2019). CAB categorizes consumer contact into five types: 1) complaints;¹⁰⁷ 2) informal
15 complaints;¹⁰⁸ 3) impound;¹⁰⁹ 4) phone contact;¹¹⁰ and 5) inquiry.^{111,112} In the last five

¹⁰⁴ Attachment 4-1, GSWC's GO 103-A Performance from 2015-2019.

¹⁰⁵ GSWC Measures to Improve Customer Service January 2018 through June 2018 report, dated October 1, 2018. GSWC Measures to Improve Customer Service January 2018 to December 2018 report, dated April 1, 2019.

¹⁰⁶ CPUC Website CAB Home Page (<https://www.cpuc.gov/cab/>). Accessed September 22, 2020.

¹⁰⁷ Complaints are defined as written consumer contacts in which consumer is protesting or expressing dissatisfaction with an action or practice of a regulated utility (including issues that may be outside the purview of CAB to investigate or outside the regulatory authority of the Commission). These issues are not forwarded to the utility for resolution but handled as a referral to the appropriate utility, CPUC division, entity, or closed outright with the appropriate letter of explanation.

¹⁰⁸ Informal complaints are defined as written consumer contacts expressing dissatisfaction with, or a dispute with a utility regarding issues within the regulatory authority of the CPUC. These issues are forwarded to the utility for investigation and response.

¹⁰⁹ Impounds are defined as informal complaints sent to the utility for resolution. The disputed charges are held in trust with the Commission's Fiscal Office pending case resolution. Depending on the outcome, the money may be distributed to the utility, the consumer, or a portion to each as a result of a compromise.

¹¹⁰ Phone contacts are defined as all consumer calls in reference to concerns, questions, and complaints related to utilities. These contacts are no longer coded as complaints, inquiries, etc.

years (2015-2019), 1,034 GSWC customers contacted CAB.¹¹³ The number of GSWC's customer contacts with CAB by type is shown in the table below for the 2015-2019 period.

Table 4-1: Number of Contacts Received from GSWC Customers (2015-2019)¹¹⁴

Contact Type	2015	2016	2017	2018	2019
Complaint	12	6	9	15	11
Informal Complaint	55	43	49	36	29
Impound	9	3	3	2	0
Phone Contact	228	151	154	129	84
Inquiry	0	2	0	4	0
Total	304	205	215	186	124

C. Customer Inquiries to GSWC

GSWC receives complaints directly from its customers regarding billing, water quality, and water service. GSWC categorizes these complaints into the following: 1) billing; 2) pressure; 3) water quality; and 4) leaks. The table below shows the number of complaints companywide for the past six years (2014-2019).

Table 4-2: Customer Complaints Sent Directly to GSWC – Companywide (2014-2019)¹¹⁵

Total Number of Complaints

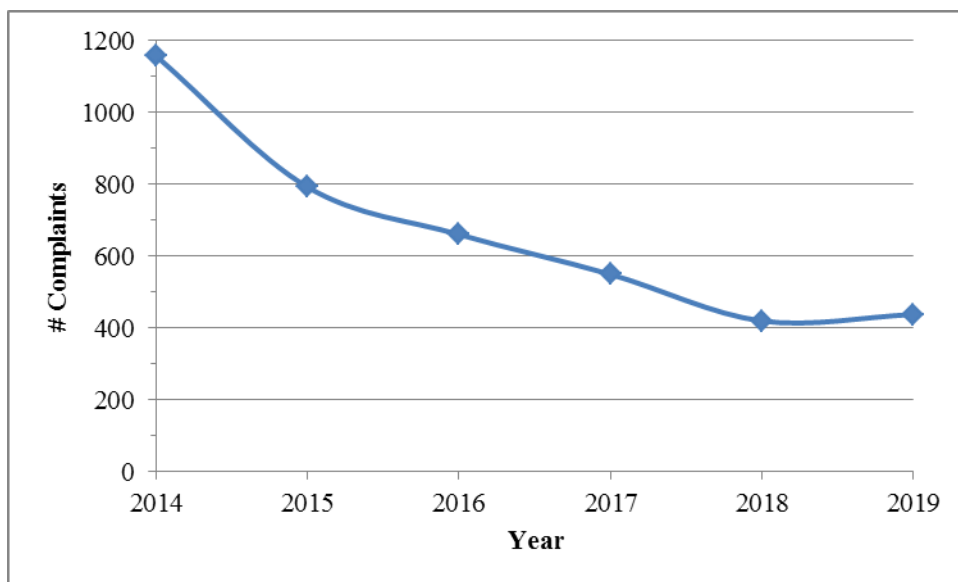
¹¹¹ Inquiries are defined as written consumer contacts requesting facts and information for a situation.

¹¹² Standard Disclosure for CAB Data, CPUC Consumer Service and Information Division, revised September 3, 2014.

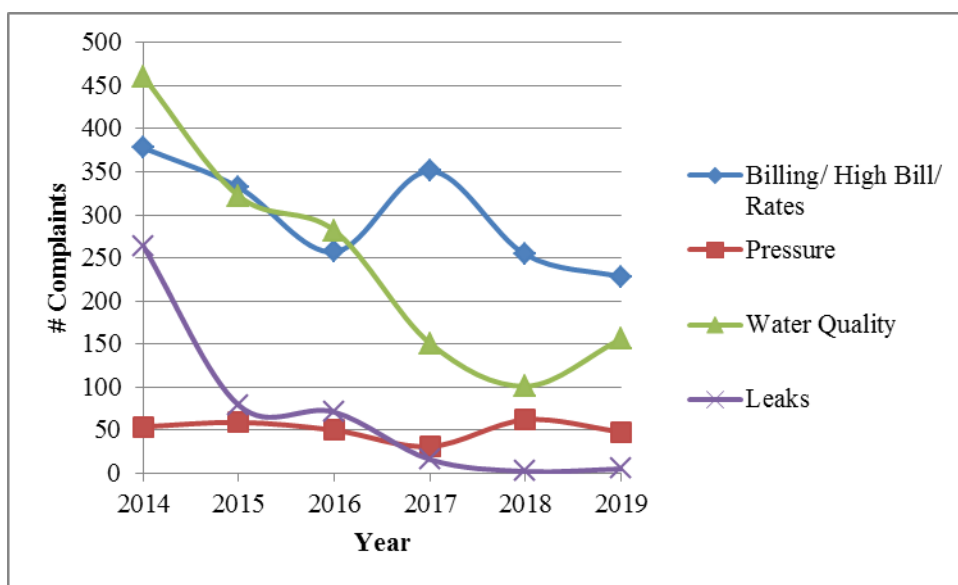
¹¹³ Attachment 4-4, Email from Thomas Ward (CAB) to Phong Ly (Cal Advocates), dated August 17, 2020.

¹¹⁴ Attachment 4-4, Email from Thomas Ward (CAB) to Phong Ly (Cal Advocates), dated August 17, 2020.

¹¹⁵ Minimum Data Requirements (MDR) Response #II.H.1. GSWC's response to MDR#II.H.1 from this rate case was used for years 2016-2019. GSWC's response to MDR#II.H.1 from the 2017 rate case (A.17-07-010) was used for years 2014 and 2015.



Number of Complaints by Type



The table above shows that the total number of complaints has generally decreased over time. The majority of complaints is due to either billing¹¹⁶ or water quality issues.

¹¹⁶ GSWC classifies their billing related complaints into three categories: 1) meter reading (incorrectly read meters, mainly attributed to staffing turnover); 2) meter accuracy (that was tracked to faulty meters); and 3) other billing issues (e.g. incorrect estimates that were automatically generated by the billing system). GSWC states that the majority of the billing related complaints are related to the meter reading category.

1 GSWC states that it has an internal complaint resolution system when the company
2 receives complaints.¹¹⁷

3 GSWC states that it has implemented an informal complaint process for calls that
4 distributes and tracks all informal complaints received and processes them as cases in
5 their customer care and billing (CC&B).¹¹⁸ GSWC states that these complaints are stored
6 in a monitoring log (CPUC Informal Complaints Monitoring Log) that is updated through
7 GSWC's CSC.¹¹⁹ The GSWC groups involved in processing complaints include:
8 GSWC's Regulatory Affairs group, CPUC Process Group, Superintendent, District
9 Manager, Regulatory Affairs Informal Complaint Group. GSWC's Regulatory Affairs
10 group acts as GSWC's contact for the CPUC and sends complaints to GSWC's CPUC
11 Process Group once a complaint is initiated.¹²⁰ GSWC states that the Superintendent is
12 responsible for investigating the customer complaint and drafting a complaint response
13 for the District Manager to review and approve.¹²¹ GSWC states that the District
14 Manager finalizes the complaint response and distributes the complaint response to the
15 other GSWC groups.¹²² GSWC's Regulatory Affairs Informal Complaints Group sends

¹¹⁷ Attachment 4-5, GSWC Response to Public Advocates DR JMI-014, Q.1. GSWC states that informal complaints are complaints that do not require a CPUC proceeding to resolve. GSWC states that the majority of these complaints are due to service related issues experienced by their customers in the RMAs.

¹¹⁸ Attachment 4-6, GSWC Response to Public Advocates Data Request JMI-014, Attachment JMI-014 Q.2 (Customer Service Procedures, CPUC Complaint Process). Some of the information recorded for each case include: date of receipt, critical points of handling, date of forwarding to critical points of handling, response date to CPUC, account information, and informal complaint number.

¹¹⁹ Attachment 4-6, GSWC Response to Public Advocates Data Request JMI-014, Attachment JMI-014 Q.2 (Customer Service Procedures, CPUC Complaint Process).

¹²⁰ Attachment 4-6, GSWC Response to Public Advocates Data Request JMI-014, Attachment JMI-014 Q.2 (Customer Service Procedures, CPUC Complaint Process).

¹²¹ Attachment 4-6, GSWC Response to Public Advocates Data Request JMI-014, Attachment JMI-014 Q.2 (Customer Service Procedures, CPUC Complaint Process). GSWC states that the Superintendent is supposed to provide a draft complaint response to the District Manager within 15 days of receiving the complaint.

¹²² Attachment 4-6, GSWC Response to Public Advocates Data Request JMI-014, Attachment JMI-014 Q.2 (Customer Service Procedures, CPUC Complaint Process). GSWC states that the District Manager is supposed to finalize the complaint response within five days of receiving the draft complaint response and distribute within two days of finalizing the complaint response. GSWC states that internal copies are

1 the final response to the CPUC once it is received by the District Manager and is
2 recorded by GSWC's CPUC Process Group, which records when GSWC sends their
3 response to the CPUC for GSWC's internal records.¹²³

4 In response to Commission Minimum Data Requirement (MDR), GSWC
5 describes methods in reducing the number of complaints.¹²⁴ In addition to proposed
6 capital improvements,¹²⁵ some of these methods include: 1) providing online courses to
7 enhance employee knowledge of the customer care and billing system; 2) establish a
8 more frequent flushing program in areas with dead-end mains; 3) review meter misreads
9 semi-annually to monitor the frequency and identify opportunities to minimize future
10 incidents; and 4) provide adequate customer notification for planned flushing and
11 temporary disruptions through mailing postcards.¹²⁶

12 **IV. Conclusion**

13 The Commission should ensure that GSWC is meeting its performance standards
14 and provide quality service to its customers. GSWC should work on the following to
15 improve their customer service to comply with GO 103-A standards:

- 16 1. GSWC should increase the rate of answering customer calls within 30 seconds
17 (during normal business hours) after requesting to speak with a CSR above the
18 standard of at least 80% established in GO 103-A.

provided to the Vice President, District Manager, Superintendent, Regulatory Affairs Group, and the CSC CPUC Process Group.

¹²³ Attachment 4-6, GSWC Response to Public Advocates Data Request JMI-014, Attachment JMI-014 Q.2 (Customer Service Procedures, CPUC Complaint Process). GSWC states that the customer complaint response is supposed to be sent to the CPUC within 24 hours after being notified by the District Manager.

¹²⁴ MDR Response #II.H.2.

¹²⁵ Some of the capital improvements include: 1) replacing old cast iron mains, steel mains, dead-end mains; 2) replacing old galvanized and polyethylene services with new copper services; 3) replacing leaky valves and hydrants as part of the pipeline replacement projects.

¹²⁶ MDR Response #II.H.2.

2. GSWC should continue to reduce its rate of scheduled appointments missed within the company's control below the standard of no more than 5% established in GO 103-A.

[END OF CHAPTER]

ATTACHMENT 1-1: STATEMENT OF QUALIFICATIONS

STATEMENT OF QUALIFICATIONS – JUSTIN MENDA

Q1. Please state your name, business address, and position with the California Public Utilities Commission (Commission).

A1. My name is Justin Menda and my business address is 505 Van Ness Ave, California 94102. I am a Utilities Engineer in the Communication and Water Policy Branch of the Public Advocates Office of California Public Utilities Commission.

Q2. Please summarize your education background and professional experience.

A2. I received a Bachelor of Science Degree and Master of Science Degree in Civil Engineering from the University of California Irvine.

I have been employed by the Public Advocates Office – Communications and Water Policy Branch since June 2012. Since that time, I prepared testimony on capital investment in several GRCs: California Water Service Company's 2012, 2015 and 2018 GRCs; California-American Water's 2013, 2016, and 2019 GRCs; San Jose Water Company's 2015 GRC; and Golden State Water Company's 2017 GRC.

Q3. What is your responsibility in this proceeding Golden State Water Company GRC A.20-07-012?

A3. I am responsible for the preparation of testimony regarding proposed plant projects in the Los Osos and Santa Maria RMAs, proposed blanket budget, and customer service.

Q4. Does this conclude your prepared direct testimony?

A4. Yes, it does.

ATTACHMENT 1-2: GSWC RESPONSE TO
PUBLIC ADVOCATES DR JMI-004



September 3, 2020

Justin Menda, Public Advocates Office
CALIFORNIA PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco, CA 94102

Subject: Data Request JMI-004 (A.20-07-012) LO SM SCADA Response
Due Date: August 31, 2020; Extension Due Date: September 14

Dear Justin Menda,

In response to the above referenced data request number, we are pleased to submit the following responses:

Question 1:

In regards to the "System wide, Supervisory Control and Data Acquisition (SCADA) Upgrade" project for the Santa Maria customer service area:

- a. Page 58 of the Prepared Testimony of Patrick Kubiak lists the type of equipment that needs to be upgraded at each site. Pages 66-67 of the Prepared Testimony of Patrick Kubiak defines the upgrade options. For each of the sites listed in the table on page 58 of the Prepared Testimony of Patrick Kubiak for the Santa Maria customer service area, please label the appropriate upgrade option selected by GSWC for inclusion in rates.
- b. The "PCE_RI – Santa Maria (System wide SCADA)" workpaper shows the cost estimate for the proposed project. The "Construction Cost" tab shows the "New SCADA" line item is \$599,350. However, this number is hardcoded. Please provide a cost breakdown of this line item.
- c. In the "Construction Cost" tab, there is a comment regarding "Overall FTS Estimates" starting at line 15 as shown below.

Overall FTS Estimates

\$2,599,911.75

\$11,111.11

\$483,411.63 1/3 of Coastal District Construction Costs

Please provide further explanation of this comment.

Response 1:

- a. While preparing a response to this data request, GSWC noticed that the list of Northern and Coastal Districts sites identified on pages 58 and 59 of the Prepared Testimony of Patrick Kubiak was not up to date.

The up to date list of sites with the associated SCADA upgrade option for the Santa Maria, Simi Valley, Los Osos, Rancho Cordova, Clearlake, and Bay Point service areas is shown in the tables below.

Sites	Equipment To Be Upgraded					Option
	PLC	Telemetry	Network	HMI	OIT	
Santa Maria						
Crescent	X	X			X	Option 4
Woodmere #1	X	X			X	Option 4
Woodmere #2	X	X			X	Option 4
Kenneth	X	X			X	Option 4
Mira Flores #2	X	X			X	Option 4
Oak	X	X			X	Option 4
Simi Valley						
Simi Valley CSA Office				X		Option 6
Alamo Reservoir	X	X			X	Option 4
Aspen	X	X			X	Option 4
Fitzgerald Plant	X	X			X	Option 4
Lautenschlager Reservoir	X	X			X	Option 4
Tapo Reservoir	X	X			X	Option 4
Los Osos						
Country Club Reservoir	X	X			X	Option 4
Country Club Filter Plant	X	X			X	Option 4
Edna Boosters	X	X			X	Option 4
Lewis Lane	X	X			X	Option 4
Cabrillo	X	X			X	Option 4
Alamo Reservoir	X	X			X	Option 4

Sites	Equipment To Be Upgraded					
	PLC	Telemetry	Network	HMI	OIT	
Rancho Cordova						
Park Well 17	X	X			X	Option 4
Paseo Well 24	X	X			X	Option 4
South Bridge St Well 22&22B	X	X			X	Option 4
Coloma PRV	X	X			X	Option 4
Folsom PRV	X	X			X	Option 4
Oselot	X	X			X	Option 4
Trade Center PRV	X	X			X	Option 4
Clear Lake						
Lake Shore Booster (Intake)	X	X			X	Option 4
Oak Crest Tank And Booster	X	X			X	Option 4
Sampson Reservoir	X	X			X	Option 4
San Joaquin Booster	X	X			X	Option 4
Sonoma Treatment Plant		X		X		Option 6
Manchester Intertie	X	X			X	Option 4
Chart Recorder	X	X			X	Option 4
Baypoint						
Chadwick	X	X			X	Option 4
Evora	X	X			X	Option 4
Hill St. Reservoir	X		X		X	Option 4
Hill St. Treatment Plant	X	X		X		Option 6
Madison	X	X			X	Option 4
Pacifica	X	X			X	Option 4
Skyline	X	X			X	Option 4

- b. The \$599,350 "New SCADA" line item reflects the individual option upgrade costs associated with the six (6) Santa Maria sites shown in the table above in addition to the cost of additional SCADA Galaxy licenses and software upgrades not already included in the individual option upgrade costs.
- c. This comment should be ignored. It was not intended to be included in the PCE.

Question 2:

In regards to the "System wide, SCADA Upgrade" project for the Los Osos customer service area:

- a. Page 58 of the Prepared Testimony of Patrick Kubiak lists the type of equipment that needs to be upgraded at each site for the Coastal District. However, the site(s) in which GSWC plans to upgrade SCADA is not shown for the Los Osos customer service area. For each site in which GSWC plans to upgrade SCADA as part of the

proposed project in the Los Osos customer service area, please list which type of equipment that needs to be upgraded. Please provide a table in a format similar to the tables shown on page 58 of the Prepared Testimony of Patrick Kubiak.

b. For each site listed in response to question 2.a above, please label the appropriate upgrade option selected by GSWC for inclusion in rates.

c. The "PCE_RI – Los Osos (System wide SCADA)" workpaper shows the cost estimate for the proposed project. The "Construction Cost" tab shows the "New SCADA" line item is \$599,350. However, this number is hardcoded. Please provide a cost breakdown of this line item.

d. In the "Construction Cost" tab, there is a comment regarding "Overall FTS Estimates" starting at line 15 as shown below. .

Overall FTS Estimates

\$1,101,896.00

\$11,111.11

\$483,411.63 1/3 of Coastal District Construction Costs

Please provide further explanation of this comment.

Response 2:

a. The list of sites in the Los Osos service area where SCADA equipment should be upgraded is shown in the table below.

Sites	Equipment To Be Upgraded					Option
	PLC	Telemetry	Network	HMI	OIT	
Los Osos						
Country Club Reservoir	X	X			X	Option 4
Country Club Filter Plant	X	X			X	Option 4
Edna Boosters	X	X			X	Option 4
Lewis Lane	X	X			X	Option 4
Cabrillo	X	X			X	Option 4
Alamo Reservoir	X	X			X	Option 4

b. Upgrade options for each site are shown in the table above.

c. The \$599,350 "New SCADA" line item reflects the individual option upgrade costs associated with the six (6) Los Osos sites shown in the table above in addition to the cost of additional SCADA Galaxy licenses and software upgrades not already included in the individual option upgrade costs.

-
- d. This comment should be ignored. It was not intended to be included in the PCE.

Question 3:

GSWC discusses the process of how GSWC developed the SCADA upgrade budgets in the Prepared Testimony of Patrick Kubiak. The table shown on page 67 of the Prepared Testimony of Patrick Kubiak shows the budget associated with each upgrade option.

- a. Elaborate on how the cost estimates shown in the table on page 67 of the Prepared Testimony of Patrick Kubiak was calculated for each upgrade option. Please provide a cost breakdown of each cost estimate for each upgrade option and provide any supporting documentation verifying the proposed cost estimate.
- b. If GSWC used the probable cost estimate shown in Table 7.1 on page 40 of the GSWC SCADA Assessment Final Report (provided as Appendix C of the SCADA Master Plan (Attachment E of the Prepared Testimony of Patrick Kubiak)) to estimate the costs shown in the table on page 67 of the Prepared Testimony of Patrick Kubiak in response to question 3.a above, elaborate on how the probable costs shown in Table 7.1 was used to calculate the estimated upgrade costs shown in the table on page 67 of the Prepared Testimony of Patrick Kubiak for each upgrade option.

Response 3:

- a. The cost estimates shown in the table on page 67 of the Prepared Testimony of Patrick Kubiak were developed using the option costs depicted in Table 7.1 on page 40 of the 2016 GSWC SCADA Assessment Final Report (provided as Appendix C of the SCADA Master Plan (Attachment E of the Prepared Testimony of Patrick Kubiak)) as a starting point. A detailed description of how these option costs were developed is available in Chapter 7, page 40 of the 2016 GSWC SCADA Assessment Final Report (provided as Appendix C of the SCADA Master Plan (Attachment E of the Prepared Testimony of Patrick Kubiak)).
- b. GSWC used the option costs depicted in Table 7.1 on page 40 of the 2016 GSWC SCADA Assessment Final Report (provided as Appendix C of the SCADA Master Plan (Attachment E of the Prepared Testimony of Patrick Kubiak)) as a starting point. These options costs were then escalated to the year 2020 using the historical inflation factor for the 2016-2020 period as provided by the U.S. Bureau of Labor Statistics (1.07). Finally, the resulting option costs were escalated using a 5% contingency factor.

The 2016 option costs, 2020 option costs, and escalated 2020 option costs are shown in the table below.

Source: 2016 SCADA Assessment by Cannon	Option Cost (\$2016)	Option Cost (\$2020)	Escalated Option Cost (\$2020)
Option 1	\$12,500.00	\$13,375.00	\$14,043.75
Option 2	\$44,000.00	\$47,080.00	\$49,434.00
Option 3	\$52,000.00	\$55,640.00	\$58,422.00
Option 4	\$56,000.00	\$59,920.00	\$62,916.00
Option 5	\$49,000.00	\$52,430.00	\$55,051.50
Option 6	\$120,000.00	\$128,400.00	\$134,820.00

Question 4:

GSWC discusses the process of how GSWC developed the SCADA upgrade project budgets in the Prepared Testimony of Patrick Kubiak. GSWC discusses step 7 of this process (add construction costs) on pages 68-69 of the Prepared Testimony of Patrick Kubiak. The table on pages 68-69 of the Prepared Testimony of Patrick Kubiak shows the construction cost categories and the associated percentage of SCADA Upgrade Budget for Individual Sites and Treatment Plants.

- a. For the total percentage that is applied to all applicable upgrades and improvements identified in steps 3 and 5 of GSWC's process of developing the SCADA upgrade project budgets (as discussed in the Prepared Testimony of Patrick Kubiak), does the total percentage include all the construction cost categories listed in the table on pages 68-69 of the Prepared Testimony of Patrick Kubiak? If not, which construction cost categories are not included?
- b. Please verify the total percentage of the construction cost categories that is applied to the applicable upgrades and improvements identified in steps 3 and 5 of GSWC's process of developing the SCADA upgrade project budgets (as discussed in the Prepared Testimony of Patrick Kubiak).

Response 4:

- a. All the construction cost categories listed in the table on pages 68-69 are included in the SCADA upgrade project budgets calculations.
- b. The total percentage has been verified.

If you have any questions, please do not hesitate to call me at (909) 394-3600, Extension 680.

Sincerely yours,

Jon
Pierotti

Digitally signed by Jon Pierotti
DN: cn=Jon Pierotti, o=GSWC,
ou=Regulatory Affairs,
email=jon.pierotti@gswater.com
c=US
Date: 2020.09.03 15:31:37 -0700

For Keith Switzer
Vice President – Regulatory Affairs

c: Eileen Odell, Project Lead
Shanna Foley, Attorney for Public Advocates Office
Joseph Karp, Attorney for GSWC
Chris Kolosov, Attorney for GSWC
Jenny Darney-Lane, Manager of Regulatory Affairs
Jon Pierotti, Manager of Regulatory Affairs

ATTACHMENT 1-3: GSWC RESPONSE TO
PUBLIC ADVOCATES DR JMI-012

1



October 15, 2020

Justin Menda, Public Advocates Office
CALIFORNIA PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco, CA 94102

Subject: Data Request JMI-012 (A.20-07-012) SCADA PLC LO SM Response
Due Date: October 15, 2020

Dear Justin Menda,

In response to the above referenced data request number, we are pleased to submit the following responses:

Question 1:

In response to question 1a of data request A2007012 JMI-004 regarding Supervisory Control and Data Acquisition (SCADA) projects in the Santa Maria customer service area (Santa Maria Systemwide, SCADA Upgrade), GSWC lists the sites where GSWC plans to upgrade SCADA. One of the sites GSWC listed in response to question 1a of data request A2007012 JMI-004 was the Crescent Plant. GSWC shows the cost estimate for the proposed Crescent Well 1, Site Improvements project in the "PCE_RI – Orcutt (Crescent Well 1, Site Improvements)" worksheet, "Construction Cost" tab. In the cost estimate for the proposed Crescent Well 1, Site Improvements project, there are two line items referred to as "PLC/OIT Section" (item #8) and "SCADA Programming" (item #9). Please elaborate on how the scope of the two line items (items #8 and 9) from the Crescent Well 1, Site Improvements project differs from the proposed upgrade in the Santa Maria Systemwide, SCADA Upgrade project.

Response 1:

The Scope of Work for the 'Crescent Well 1, Site Improvements' project described in the Hanford-Inscro Testimony includes a PLC/OIT panel section that corresponds with replacement of the entire MCC, but the remaining SCADA portion of the project is focused on the updates necessary to implement proposed operational modifications resulting from changing out the discharge piping PRV for a VFD (i.e. Additional IO and SCADA/control

modifications related to the new components). The scope described in the Hanford-Insc0 Testimony does not represent the complete SCADA upgrade of obsolete components (i.e. upgrading the Programmable Logic Controller (PLC) from Modicon Compact to M340, upgrading the radio equipment, and upgrading the Operator Interface Terminal (OIT) programming) requested in Patrick Kubiak's Prepared Testimony.

Question 2:

In response to question 2a of data request A2007012 JMI-004 regarding SCADA projects in the Los Osos customer service area (Los Osos Systemwide, SCADA Upgrade), GSWC lists the sites where GSWC plans to upgrade SCADA.

- a. One of the sites GSWC listed in response to question 2a of data request A2007012 JMI-004 was the Country Club Filter Plant. A portion of the equipment that GSWC plans to upgrade is the programmable logic controller (PLC). In the "2020 GRC Blankets Capital Projects Template_R1 – LO_ Final APP" workpaper, "B8-CC Plant PLC Upgrade" tab, GSWC requests funding to upgrade the existing PLC equipment at the Country Club Treatment Plant. Please elaborate for the Country Club Treatment Plant on how the scope of the PLC upgrade in the Los Osos Systemwide, SCADA Upgrade project differs from upgrading the PLCs through the blanket budget.
- b. One of the sites GSWC listed in response to question 2a of data request A2007012 JMI-004 was the Country Club Filter Plant. GSWC shows the cost estimate for the proposed Country Club Plant, Selenium Treatment project in the "PCE_RI – Edna Rd (Country Club Plant, Selenium Treatment)" workpaper, "Construction Cost" tab. In the cost estimate for the proposed Country Club Plant, Selenium Treatment project, there are two line items referred to as "PLC Upgrades/Additional IO" (item #5) and "SCADA and control modification" (item #4). Please elaborate on how the scope of the two line items (items #4 and 5) from the Country Club Plant, Selenium Treatment project differs from the proposed PLC upgrades through the blanket budget and the proposed upgrades in the Los Osos Systemwide, SCADA Upgrade project.
- c. One of the sites GSWC listed in response to question 2a of data request A2007012 JMI-004 was the Alamo Reservoir. Page 1 of Attachment G of the Prepared Testimony of Elizabeth V. McDonough and Dane T. Sinagra shows the revised cost estimate for the Alamo Reservoir Replacement project. Under the additional costs portion of the aforementioned revised cost estimate, GSWC estimates approximately \$25,000 related to "SCADA Programming." Please elaborate for the Alamo Reservoir how the scope of the SCADA upgrades in the Los Osos Systemwide, SCADA Upgrade project differs from SCADA programming portion of the Alamo Reservoir Replacement Project.

Response 2:

- a. The scopes for the PLC upgrade at the Country Club Filter Plant considered in the "2020 GRC Blankets Capital Projects Template_R1 – LO_ Final APP" workpaper and in the response to question 2a of data request A2007012 JMI-004 are similar. As a result, GSWC is only requesting funding for the PLC upgrade described in response to question 2a of data request A2007012 JMI-004 and would like to withdraw the request made in the "2020 GRC Blankets Capital Projects Template_R1 – LO_ Final APP" workpaper.
- b. As stated in GSWC's response to data request BYU-007, Question 4: "The Scope of Work related to SCADA at the Country Club Selenium Treatment described in the Hanford-Insco Testimony is solely focused on completing a SCADA modification necessary to implement the proposed Selenium treatment modifications [i.e. Additional IO and SCADA/control modifications related to new treatment train components]. The scope described in the Hanford-Insco Testimony does not represent the complete SCADA upgrade [i.e. upgrading the Programmable Logic Controller (PLC) from Modicon Compact to M340, upgrading the radio equipment, and upgrading the Operator Interface Terminal (OIT) programming] requested in Patrick Kubiak's Prepared Testimony and the response to data request JMI-004."
- c. The estimated costs for "SCADA Programming" for the Alamo Reservoir Replacement project include the costs associated with reprogramming the existing SCADA system so the equipment can function properly to pump to a closed pressure zone, as required during construction of the Alamo Reservoir Replacement project. The equipment typically pumps to an open pressure zone, so the modifications are required to provide adequate water service.

The Los Osos Systemwide, Upgrade SCADA project includes estimated costs for materials and labor to upgrade the Los Osos SCADA System to a new SCADA platform.

If you have any questions, please do not hesitate to call me at (909) 394-3600, Extension 680.

Sincerely yours,

For Keith Switzer
Vice President – Regulatory Affairs

c: Eileen Odell, Project Lead
Shanna Foley, Attorney for Public Advocates Office
Joseph Karp, Attorney for GSWC
Chris Kolosov, Attorney for GSWC
Jenny Darney-Lane, Manager of Regulatory Affairs
Jon Pierotti, Manager of Regulatory Affairs

ATTACHMENT 1-4: CAL ADVOCATES' **RECOMMENDED VEHICLE REPLACEMENT**

1

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Region 1¹²⁷

District	RMA/ District Office	Asset #	Asset Description	Year			Total
				2021	2022	2023	
Northern	Arden/Cordova RMA	1277	2006 Chevy Silverado 3500	\$ 64,800			\$ 64,800
Northern	Arden/Cordova RMA Office	1257	2005 Chevy Silverado C2500 HD	\$ 57,600			\$ 57,600
Northern	Arden/Cordova RMA Office	1278	2006 Chevy Silverado C2500 HD	\$ 57,600			\$ 57,600
Northern	Arden/Cordova RMA Office	2184	2008 Chevy Silverado C2500 HD		\$ -		\$ -
Northern	Arden/Cordova RMA Office	70174	2009 Chevy Malibu	\$ 26,500			\$ 26,500
Northern	Clearlake RMA Office	500278	2011 GMC Sierra C2500 HD			\$ -	\$ -
Northern	Northern District Office	500255	2012 Ford Taurus	\$ 36,200			\$ 36,200
Northern	Northern District Office	503394	2014 Ram Van	\$ 31,100			\$ 31,100
Northern	Northern District Office	503577	2015 Ford Transit Connect			\$ 32,100	\$ 32,100
Coastal	Coastal District Office	500476	2012 Chevy Express Cargo Van			\$ 32,100	\$ 32,100
Coastal	Coastal District Office	504187	2016 Chevy Impala	\$ 36,200			\$ 36,200
Coastal	Los Osos RMA Office	2183	2007 Chevy Silverado C2500 HD	\$ 57,600			\$ 57,600
Coastal	Los Osos RMA Office	500079	2010 Chevy Silverado 2500 HD	\$ 57,600			\$ 57,600
Coastal	Los Osos RMA Office	70595	2009 Chevy Silverado 2500 HD	\$ -			\$ -
Coastal	Santa Maria RMA	500420	2011 Chevy Silverado	\$ -			\$ -
Coastal	Santa Maria RMA	500826	2012 Chevy Silverado 2500 HD		\$ 58,500		\$ 58,500
Coastal	Santa Maria RMA	500827	2012 Chev Silverado 2500 HD		\$ -		\$ -
Coastal	Santa Maria RMA	504104	2016 Ford Fusion-SM Supt	\$ 26,500			\$ 26,500
Coastal	Santa Maria RMA	504651	2016 Dodge		\$ -		\$ -
Coastal	Santa Maria RMA Office	68589	2009 Chevy Silverado 2500 HD	\$ 57,600			\$ 57,600
Coastal	Simi Valley RMA Office	1252	2005 Chevy Silverado C2500 HD	\$ -			\$ -
Coastal	Simi Valley RMA Office	70772	2009 Chevy Silverado 2500 HD	\$ -			\$ -
			Total	\$ 509,300	\$ 58,500	\$ 64,200	\$ 632,000

2

3

Region 2¹²⁸

¹²⁷ The costs shown in the tables where there are no adjustments are taken from GSWC RO Model, workpaper: Y_SEC-50_RB_2020 GRC Blankets Capital Projects, tab: Vehicle List.

¹²⁸ The costs shown in the tables where there are no adjustments are taken from GSWC RO Model, workpaper: Y_SEC-50_RB_2020 GRC Blankets Capital Projects, tab: Vehicle List.

District	RMA/ District Office	Asset #	Asset Description	Year			Total
				2021	2022	2023	
Central	Central Basin East - Blackburn Field Office	70940	2010 Truck GMC 2500HD 2WD			\$ -	\$ -
Central	Central Basin East - Blackburn Field Office	70943	2010 Truck GMC 2500HD 2WD		\$ -		\$ -
Central	Central Basin East - Blackburn Field Office	71023	2010 Truck GMC 2500HD	\$ 57,600			\$ 57,600
Central	Central Basin East RMA Office	2193	2008 Truck, GMC 2500 HD	\$ 57,600			\$ 57,600
Central	Central Basin East RMA Office	501370	2013 Truck, Ford F250			\$ -	\$ -
Central	Central Basin East RMA Office	68707	2008 Truck -GMC 2500HD	\$ 57,600			\$ 57,600
Central	Central Basin West - Bissell Plant	2156	2007 Chevy Silverado 2500HD	\$ 57,600			\$ 57,600
Central	Central Basin West RMA Office	2158	2008 Auto, Chevy Malibu	\$ 26,500			\$ 26,500
Central	Central Basin West RMA Office	2196	2008 Truck, GMC 2500 HD	\$ -			\$ -
Central	Central Basin West RMA Office	68974	2009 Truck -GMC 2500HD	\$ -			\$ -
Central	Central District Office - WS	502426	2014 Chevy 2500HD w/CT	\$ 57,600			\$ 57,600
Central	Central District Office - WS	502427	2014 Chevy 2500HD w/CT			\$ -	\$ -
Central	Central District Office - WS	69848	2009 Ford F350 w/Scelzi Body			\$ -	\$ -
Central	Central District Office - WS	71024	2010 Chevy Silverado 2500HD	\$ 57,600			\$ 57,600
Central	Culver City RMA Office	67548	2008 GMC Sierra 2500HD	\$ 57,600			\$ 57,600
Central	Culver City RMA Office	69675	2009 GMC Sierra 2500HD	\$ 57,600			\$ 57,600
Central	Culver City RMA Office	71245	2010 Truck, GMC/Chevy 2500HD		\$ -		\$ -
Southwest	Southwest - Chadron Office - WS	2080	2006 Chevy Silverado 2500HD	\$ -			\$ -
Southwest	Southwest - Chadron Office - WS	2100	2006 Truck, Ford F350 Chassis	\$ 64,800			\$ 64,800
Southwest	Southwest - Chadron Office - WS	500075	2011 Truck, Ford F350			\$ -	\$ -
Southwest	Southwest - Chadron Office - WS	505499	2018 Ford Fusion			\$ -	\$ -
Southwest	Southwest - Chadron Office - WS	71538	2011 Truck Ford-F350 SD			\$ -	\$ -
Southwest	Southwest - Spring Street Office	2041	2005 Ford-F250 SD	\$ -			\$ -
Southwest	Southwest - Spring Street Office	500752	2012 Chevy Colorado		\$ 32,300		\$ 32,300
Southwest	Southwest - Spring Street Office	501203	2013 Chevy 2500			\$ -	\$ -
Southwest	Southwest - Spring Street Office	502425	2014 Chevy Malibu LS Sedan		\$ 26,900		\$ 26,900
Southwest	Southwest - Spring Street Office	67467	2008 Truck, Ford F-350 Pickup			\$ -	\$ -
Southwest	Southwest - Spring Street Office	786	1999 Truck, Flatbed Ford F350	\$ 64,800			\$ 64,800
Southwest	Southwest District and RMA Office	502746	2015 Chevy Silverado 2500			\$ -	\$ -
Total				\$ 616,900	\$ 59,200	\$ -	\$ 676,100

Region 3¹²⁹

¹²⁹ The costs shown in the tables where there are no adjustments are taken from GSWC RO Model, workpaper: Y_SEC-50_RB_2020 GRC Blankets Capital Projects, tab: Vehicle List.

District	RMA/ District Office	Asset #	Asset Description	Year			Total
				2021	2022	2023	
Foothill	Claremont CSA Office	69412	2009 Chevy Silverado 2500HD	\$ 57,600			\$ 57,600
Foothill	Foothill District Office	1239	2005 GMC Sierra C2500 HD	\$ -			\$ -
Foothill	Foothill District Office	1295	2008 GMC Sierra C2500HD	\$ 57,600			\$ 57,600
Foothill	Foothill District Office	1314	2008 Ford F350 SD w/Toolbx	\$ 64,800			\$ 64,800
Foothill	Foothill District Office	500271	2011 Truck Silverado 3500			\$ 66,800	\$ 66,800
Foothill	Foothill District Office	500504	2012 Toyota Camry Hybrid	\$ 36,200			\$ 36,200
Foothill	San Dimas RMA Office	1222	2005 GMC Sierra C2500 3/4 ton	\$ 57,600			\$ 57,600
Foothill	San Dimas RMA Office	1280	2007 GMC Sierra C2500 HD	\$ -			\$ -
Foothill	San Dimas RMA Office	501564	2013 Chevy Truck Silverado 1500	\$ 49,200			\$ 49,200
Foothill	San Dimas RMA Office	68777	2009 Chevy Colorado		\$ 32,300		\$ 32,300
Foothill	San Gabriel RMA Office	1182	2004 GMC Sierra C2500 HD	\$ 57,600			\$ 57,600
Foothill	San Gabriel RMA Office	2128	2007Truck, Chevrolet Colorado		\$ -		\$ -
Foothill	San Gabriel RMA Office	500355	2011 Ford Truck Super Duty F35		\$ -		\$ -
Foothill	San Gabriel RMA Office	501836	2013 F-150			\$ -	\$ -
Mtn-Desert	Apple Valley RMA Office	500071	2011 Colorado	\$ -			\$ -
Mtn-Desert	Apple Valley RMA Office	501748	2013 F250 4X4	\$ 57,600			\$ 57,600
Mtn-Desert	Apple Valley RMA Office	502613	2015 Ford F350 SD	\$ 64,800			\$ 64,800
Mtn-Desert	Apple Valley RMA Office	503991	2016 2500 Chevy Silverado	\$ 57,600			\$ 57,600
Mtn-Desert	Barstow RMA Office	2112	2007 Truck, Chev Colorado	\$ 31,800			\$ 31,800
Mtn-Desert	Barstow RMA Office	500086	2011 Truck, Chev Silverado 2500 2	\$ 57,600			\$ 57,600
Mtn-Desert	Barstow RMA Office	500266	2011 GMC Sierra 2500 HD	\$ 57,600			\$ 57,600
Mtn-Desert	Barstow RMA Office	500566	2012 Ford F-450	\$ 64,800			\$ 64,800
Mtn-Desert	Barstow RMA Office	67490	2008 GMC Sierra 2500HD	\$ 57,600			\$ 57,600
Mtn-Desert	Calipatria RMA Office	500084	2008 Chevy Silverado 2500 HD	\$ 57,600			\$ 57,600
Mtn-Desert	Calipatria RMA Office	67463	2008 Chevy Silverado C2500HD			\$ -	\$ -
Mtn-Desert	Mountain/Desert District Office	505498	2017 Jeep Cherokee	\$ 36,200			\$ 36,200
Mtn-Desert	Wrightwood RMA Office	2104	2007 Chevy Silverado K2500 HD	\$ 57,600			\$ 57,600
Mtn-Desert	Wrightwood RMA Office	68693	2009 Chevy 2500 HD-4WD Pick Up	\$ -			\$ -
Mtn-Desert	Wrightwood RMA Office	70732	2010 Chevy 3500HD 4WD w/	\$ 64,800			\$ 64,800
OC	Los Alamitos RMA Office	1216	2005 Truck, Ford 250 w/Crane			\$ -	\$ -
OC	Los Alamitos RMA Office	67800	2008 Truck Ford F-250 SD	\$ -			\$ -
OC	Los Alamitos RMA Office	67952	2008 Truck-Ford F-250 SD		\$ -		\$ -
OC	Los Alamitos RMA Office	71620	2011 Truck, Chev Colorado			\$ -	\$ -
OC	Orange County District Office	1297	2008 Chevy Silverado C2500	\$ -			\$ -
OC	Orange County District Office	501457	2013 Ford F250			\$ -	\$ -
OC	Orange County District Office	505328	2017 Ford Taurus			\$ -	\$ -
OC	Orange County District Office	69348	2009 Chevy Silverado 2500 HD	\$ 57,600			\$ 57,600
OC	Orange County District Office	69349	2009 Chevy Silverado 2500 HD	\$ 57,600			\$ 57,600
OC	Orange County District Office	69350	2009 Chevy Silverado 2500HD	\$ 57,600			\$ 57,600
OC	Placentia RMA Office	1109	2003 Truck Ford F-150			\$ 50,600	\$ 50,600
OC	Placentia RMA Office	2132	Truck, Pick Up, Ford 250	\$ 57,600			\$ 57,600
Total				\$ 1,276,600	\$ 32,300	\$ 117,400	\$ 1,426,300

GO and CPM¹³⁰

¹³⁰ The costs shown in the tables where there are no adjustments are taken from GSWC RO Model, workpaper: SEC-51_RB_FDR Capital Budget, tab: GO Project List.

				Year			
District	RMA/ District Office	Asset #	Asset Description	2021	2022	2023	Total
Central/Southwest/Foothill	Central/Southwest/Foothill - CPM	503629	2015 Chevrolet Impala LT		\$ 38,900		\$ 38,900
Mtn Desert	Mtn Desert - CPM Pool	68995	2009 Chevy Malibu-CPM Pool Car	\$ 32,500			\$ 32,500
GO	Anaheim HQ (R2)	503545	2015 Ford Fusion 4 Door SE Hybrid		\$ 38,900		\$ 38,900
GO	Corporate Support	1102	2003 Ford Windstar LX-4DR			\$ 39,000	\$ 39,000
GO	Corporate Support	502447	To replace Pool Vehicle #63370			\$ 39,000	\$ 39,000
Total				\$ 32,500	\$ 77,800	\$ 78,000	\$ 188,300

1

ATTACHMENT 3-1: GSWC RESPONSE TO
PUBLIC ADVOCATES DR JMI-002



August 25, 2020

Justin Menda, Public Advocates Office
CALIFORNIA PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco, CA 94102

Subject: Data Request JMI-002 (A.20-07-012) Well Rehab Santa Maria - Response
Due Date: August 25, 2020

Dear Justin Menda,

In response to the above referenced data request number, we are pleased to submit the following responses:

Question 1:

In regards to "Casa Real Well #1, Well Improvements" proposed project in the Santa Maria customer service area as discussed on page 85 of the Prepared Testimony of Robert Hanford and Mark Insco:

- a. Please provide the most recent pump test for Casa Real Well #1.
- b. Attachment SM01 of the Prepared Testimony of Robert Hanford and Mark Insco is an engineering memo from Water Infrastructure and Management Solution regarding Casa Real Well #1. Page 1 of the aforementioned memo states that there are no records that Casa Real Well #1 has been rehabilitated in the past.
 - i. If the claim that there are no records that Casa Real Well #1 has been rehabilitated in the past is accurate, please confirm.
 - ii. If the claim that there are no records that Casa Real Well #1 has been rehabilitated in the past is inaccurate in response to question 1.b.i above, when was the last time that Casa Real Well #1 has been rehabilitated?
 - iii. For the pump at Casa Real Well #1, please provide the horsepower and the current efficiency of the pump. Please provide the date the efficiency of the pump was tested.

Response 1:

- a. The most recent pump test for Casa Real Well #1 is attached. See PDF file "JMI-002 Q.1.a Casa Real 1 Hydraulic Test Report- 2019".
- b. The attached Daily Project Inspection Report for Casa Real Well #1 dated March 28, 2018 to March 30, 2018 was identified during our research for this data request and indicates that the well was last cleaned, brushed, and treated from 03/28/2018 to 3/30/2018. See PDF file "JMI-002 Q.1.b Casa Real 1 Daily Project Inspection Report - 2018". Per the attached Hydraulic Test Report, "JMI-002 Q.1.a Casa Real 1 Hydraulic Test Report- 2019", the efficiency of the pump was last tested on 08/15/2019 and shows the pumps efficiency as average 68.6%. The horsepower of the pump is 75.

Question 2:

In regards to the "Vineyard Well #6, Well Improvements" proposed project in the Santa Maria customer service area as discussed on page 92 of the Prepared Testimony of Robert Hanford and Mark Insco:

- a. On page 2-2 of the Lake Marie Master Plan, it references a 2018 pump test for Vineyard Well #6 on footnote c of Table 2-2. Please provide a copy of the 2018 pump test.
- b. Has a pump test been conducted since the 2018 pump test for the Vineyard Well #6? If so, please provide the most recent pump test. If the 2018 pump test is the most recent pump test for the Vineyard Well #6, please confirm.
- c. Has GSWC hired any consultant to do an inspection of the Vineyard Well #6 similar to what GSWC did for the Casa Real Well #1 (refer to Attachment SM01 of the Prepared Testimony of Robert Hanford and Mark Insco)? If so, please provide a copy of any resulting report.

Response 2:

- a. A copy of the 2018 pump test for Vineyard Well #6 is attached. See PDF file "JMI-002 Q.2.a Vineyard 6 Hydraulic Test Report – 2018".
- b. Yes, a pump test for Vineyard Well #6 was conducted on 8/12/2019. A copy of this pump test is attached. See PDF file "JMI-002 Q.2.b Vineyard 6 Hydraulic Test Report – 2019".
- c. No, a consultant has not been hired to do an inspection of the Vineyard Well #6.

If you have any questions, please do not hesitate to call me at (909) 394-3600, Extension 680.

Sincerely yours,

Jon Pierotti Digitally signed by Jon Pierotti
DN: cn=Jon Pierotti, o=GSWC,
ou=Regulatory Affairs,
email=jon.pierotti@gswnet.com, c=US
Date: 2020.06.25 16:07:57 -0700

For Keith Switzer
Vice President – Regulatory Affairs

c: Eileen Odell, Project Lead
Shanna Foley, Attorney for Public Advocates Office
Joseph Karp, Attorney for GSWC
Chris Kolosov, Attorney for GSWC
Jenny Darney-Lane, Manager of Regulatory Affairs
Jon Pierotti, Manager of Regulatory Affairs

ATTACHMENT 4-1: GSWC'S GO 103-A
PERFORMANCE FROM 2015-2019

Performance Standard	Standard	2015	2016	2017	2018	2019
Total number of customer phone contacts requesting to speaking with customer service representative (CSR) during normal business hours		391,870	346,804	352,615	342,638	317,608
Number of calls taking more than 30 seconds to reach a utility CSR during normal business hours		91,188	65,407	82,066	73,791	78,606
Percentage of customer calls being answered within 30 seconds	≥ 80%	76.73%	81.14%	76.73%	78.46%	75.25%
Number of calls abandoned before reaching a CSR during normal business hours		14,559	7,796	12,712	14,024	11,686
Percentage of calls abandoned before reaching utility representative (during business hours)	≤ 5%	3.72%	2.25%	3.61%	4.09%	3.68%
Total number of bills rendered annually		2,534,507	2,536,311	2,539,565	2,537,965	2,543,123
Number of bills not rendered within 7 business days of the scheduled billing date (excluding accounts activated within 10 calendar days prior to normal billing cycle and accounts scheduled to receive a final bill within 10 calendar days after the normal billing cycle)		115	125	65	102	157
Percentage of bills rendered (mailed) within seven calendar days (excluding accounts activated within 10 calendar days prior to normal billing cycle; accounts that are scheduled to receive final bill within 10 calendar days after normal billing cycle; off-system sales; utility use accounts; periods during which rates are changed)	≥ 99%	100.00%	100.00%	100.00%	100.00%	99.99%

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Performance Standard	Standard	2015	2016	2017	2018	2019
Number of bills determined to have been rendered inaccurately annually (excluding bills found to be inaccurate strictly as a result of estimations, bills where the inaccuracy does not affect the calculation of the bill, and bills where the fault does not lie within the utility)		14,966	8,478	8,468	7,084	7,959
Percentage of bills rendered inaccurate (excluding results of estimation, bills where the inaccuracy does affect the bill calculation or where the fault does not lie with the utility)						
≤ 3%		0.59%	0.33%	0.33%	0.28%	0.31%
Number of payment posting errors		2,626	5,855	2,913	5,558	2,119
Total number of payments posted		2,347,485	2,324,468	2,334,413	2,349,746	2,350,474
Percentage of payment posting errors						
≤ 1%		0.11%	0.25%	0.12%	0.24%	0.09%
Number of scheduled meters not read		6,208	4,660	4,689	4,875	11,132
Number of meter reading scheduled		2,534,507	2,536,311	2,539,565	2,537,965	2,543,123
Percentage of scheduled meters not read						
≤ 3%		0.24%	0.18%	0.18%	0.19%	0.44%
Number of scheduled appointments missed (within utility's control)		55	50	111	241	21
Number of scheduled appointments		3,007	3,828	3,993	3,207	2,000
Percentage of scheduled appointments missed (within utility's control)						
≤ 5%		1.83%	1.31%	2.78%	7.51%	1.05%
Number of customers orders not completed on or before the scheduled date (excluding orders not completed due to events outside the utility's control)		1,133	1,037	950	482	614
Total number of customer orders scheduled and completed		49,290	48,869	48,630	44,286	41,178
Percentage of customer orders not completed on or before scheduled date (within utility's control)						
≤ 5%		2.30%	2.12%	1.95%	1.09%	1.49%
Total annual number of complaints to CAB		63	52	52	42	26
Total number of customers		283,088	283,987	283,229	284,388	285,264
Rate of complaints to CAB						
≤ 0.1%		0.02%	0.02%	0.02%	0.01%	0.01%

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**ATTACHMENT 4-2: GSWC RESPONSE TO
PUBLIC ADVOCATES DR PLY-007**

1



August 25, 2020

Phong Ly, Public Advocates Office
CALIFORNIA PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco, CA 94102

Subject: Data Request PLY-007 (A.20-07-012) GO-103-A Appendix E Response
Due Date: August 25, 2020

Dear Phong Ly,

In response to the above referenced data request number, we are pleased to submit the following responses:

Question 1:

Telephone performance standards: Please provide the following annual data for each ratemaking area in a tabulated Excel spreadsheet format for years 2015 through 2019:

- a. Total number of customer phone contacts requesting to speak with a customer service representative (CSR) during normal business hours.
- b. Number of calls taking more than 30 seconds to reach a utility CSR during normal business hours.
- c. Number of calls abandoned before reaching a CSR during normal business hours.

Question 2:

Bills performance standards: Please provide the following annual data for each ratemaking area in a tabulated Excel spreadsheet for years 2015 through 2019:

- a. Total number of bills rendered annually.
- b. Number of bills not rendered within seven business days of the scheduled billing date. Exclusions: Accounts activated within 10 calendar days prior to the normal billing cycle and accounts that are scheduled to receive a final bill within 10 calendar days after the normal billing cycle.
- c. Number of bills determined to have been rendered inaccurately annually.
Exclusions: Bills found to be inaccurate strictly as a result of estimations, bills where

the inaccuracy does not affect the calculation of the bill, and bills where the fault does not lie with the utility.

- d. Number of payments posted incorrectly due to the utility's error.
- e. Total number of payments posted.

Question 3:

Meter reading performance standards: Please provide the following annual data for each ratemaking area in a tabulated Excel spreadsheet format for years 2015 through 2019:

- a. Total number of scheduled meter reading appointments.
- b. Number of scheduled meter readings not read.

Question 4:

Work completion performance standards: Please provide the following annual data for each ratemaking area in a tabulated Excel spreadsheet format for years 2015 through 2019:

- a. Total number of scheduled appointments.
- b. Number of scheduled appointments missed. Exclusions: events outside of the utility's control that result in the work not being completed as promised

Question 5:

Work completion performance standards II: Please provide the following **monthly** data for the annual data for each ratemaking area in a tabulated Excel spreadsheet format for years 2015 through 2019:

- a. Total number of customer orders scheduled and completed.
- b. Number of customer orders not completed on or before the scheduled date.
Exclusions: any orders not completed due to events outside the utility's control.

Question 6:

Response to customer and regulatory complaints performance standards: Please provide the annual data for each ratemaking area in a tabulated Excel spreadsheet format for years 2015 through 2019:

- a. Total number of customers.
- b. Total number of complaints reported annually to the utility by the California Public Utility Commission's Consumer Affairs Branch (CAB).
- c. Complaints reported to the utility by CAB broken down by complaint type, including but not limited to high bills, deposit refunds, water quality, etc.

Responses to Questions 1 - 6:

The GO 103-A metrics are tracked at the GSWC level, not by ratemaking area and therefore the responses are not being provided by ratemaking area.

Please refer to Excel file "PLY-007 Q.1-6".

Question 1:

Telephone performance standards: Please provide the following annual data for each ratemaking area in a tabulated Excel spreadsheet format for years 2015 through 2019:

- Total number of customer phone contacts requesting to speak with a customer service representative (CSR) during normal business hours.
- Number of calls taking more than 30 seconds to reach a utility CSR during normal business hours.
- Number of calls abandoned before reaching a CSR during normal business hours.

Response 1:

	2015	2016	2017	2018	2019
a. Total number of customer phone contacts requesting to speak with a customer service representative (CSR) during normal business hours.	391,870	346,804	352,615	342,638	317,608
b. Number of calls taking more than 30 seconds to reach a utility CSR during normal business hours.	91,188	65,407	82,066	73,791	78,606
c. Number of calls abandoned before reaching a CSR during normal business hours.	14,559	7,796	12,712	14,024	11,686

Question 2:

Bills performance standards: Please provide the following annual data for each ratemaking area in a tabulated Excel spreadsheet for years 2015 through 2019:

- Total number of bills rendered annually.
- Number of bills not rendered within seven business days of the scheduled billing date. Exclusions: Accounts activated within 10 calendar days prior to the normal billing cycle and accounts that are scheduled to receive a final bill within 10 calendar days after the normal billing cycle.
- Number of bills determined to have been rendered inaccurately annually. Exclusions: Bills found to be inaccurate strictly as a result of estimations, bills where the inaccuracy does not affect the calculation of the bill, and bills where the fault does not lie with the utility.
- Number of payments posted incorrectly due to the utility's error.
- Total number of payments posted.

Response 2:

	2015	2016	2017	2018	2019
a. Total number of bills rendered annually.	2,534,507	2,536,311	2,539,565	2,537,965	2,543,123
b. Number of bills not rendered within seven business days of the scheduled billing date. Exclusions: Accounts activated within 10 calendar days prior to the normal billing cycle and accounts that are scheduled to receive a final bill within 10 calendar days after the normal billing cycle.	115	125	65	102	157
c. Number of bills determined to have been rendered inaccurately annually. Exclusions: Bills found to be inaccurate strictly as a result of estimations, bills where the inaccuracy does not affect the calculation of the bill, and bills where the fault does not lie with the utility.	14,966	8,478	8,468	7,084	7,959
d. Number of payments posted incorrectly due to the utility's error.	2,626	5,855	2,913	5,558	2,119
e. Total number of payments posted.	2,347,485	2,324,468	2,334,413	2,349,746	2,350,474

Question 3:

Meter reading performance standards: Please provide the following annual data for each ratemaking area in a tabulated Excel spreadsheet format for years 2015 through 2019:

- Total number of scheduled meter reading appointments.
- Number of scheduled meter readings not read.

Response 3:

	2015	2016	2017	2018	2019
a. Total number of scheduled meter reading appointments.	2,534,507	2,536,311	2,539,565	2,537,965	2,543,123
b. Number of scheduled meter readings not read.	6,208	4,660	4,689	4,875	11,132

Question 4:												
Work completion performance standards: Please provide the following annual data for each ratemaking area in a tabulated Excel spreadsheet format for years 2015 through 2019:												
a. Total number of scheduled appointments.												
b. Number of scheduled appointments missed. Exclusions: events outside of the utility's control that result in the work not being completed as promised												
Response 4:												
Response by Regina												
	2015	2016	2017	2018	2019							
a. Total number of scheduled appointments.	3,007	3,828	3,993	3,207	2,000							
b. Number of scheduled appointments missed. Exclusions: events outside of the utility's control that result in the work not being completed as promised	55	50	111	241	21							
Question 5:												
Work completion performance standards II: Please provide the following monthly data for each ratemaking area in a tabulated Excel spreadsheet format for years 2015 through 2019:												
a. Total number of customer orders scheduled and completed.												
b. Number of customer orders not completed on or before the scheduled date. Exclusions: any orders not completed due to events outside the utility's control.												
Response 5:												
	Jan-15	Feb-15	Mar-15	Apr-15	May-15	Jun-15	Jul-15	Aug-15	Sep-15	Oct-15	Nov-15	Dec-15
a. Total number of customer orders scheduled and completed.	3,242	3,550	4,126	3,980	3,920	4,571	4,673	4,447	4,872	4,490	3,475	3,944
b. Number of customer orders not completed on or before the scheduled date. Exclusions: any orders not completed due to events outside the utility's control.	335	66	74	72	71	91	80	75	73	94	47	55
	Jan-16	Feb-16	Mar-16	Apr-16	May-16	Jun-16	Jul-16	Aug-16	Sep-16	Oct-16	Nov-16	Dec-16
a. Total number of customer orders scheduled and completed.	3,964	3,300	3,966	3,973	3,715	4,389	4,308	4,790	4,424	4,376	4,022	3,642
b. Number of customer orders not completed on or before the scheduled date. Exclusions: any orders not completed due to events outside the utility's control.	86	89	90	64	63	78	82	76	100	109	123	77
	Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17
a. Total number of customer orders scheduled and completed.	3,672	3,124	3,933	3,593	3,781	4,407	3,610	4,833	4,362	5,103	4,266	3,946
b. Number of customer orders not completed on or before the scheduled date. Exclusions: any orders not completed due to events outside the utility's control.	107	56	88	66	78	88	70	83	87	104	77	46
	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18
a. Total number of customer orders scheduled and completed.	4,163	3,696	4,268	3,333	3,400	3,931	3,708	4,114	3,651	3,887	3,130	3,005
b. Number of customer orders not completed on or before the scheduled date. Exclusions: any orders not completed due to events outside the utility's control.	49	20	46	35	36	40	35	48	39	39	46	49
	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19
a. Total number of customer orders scheduled and completed.	3,480	3,027	3,485	3,310	3,549	3,574	3,791	3,696	3,213	3,751	3,308	2,994
b. Number of customer orders not completed on or before the scheduled date. Exclusions: any orders not completed due to events outside the utility's control.	108	54	46	61	38	39	27	26	35	50	2	128

Question 6:					
Response to customer and regulatory complaints performance standards: Please provide the annual data for each ratemaking area in a tabulated Excel spreadsheet format for years 2015 through 2019:					
a. Total number of customers.					
b. Total number of complaints reported annually to the utility by the California Public Utility Commission's Consumer Affairs Branch (CAB).					
c. Complaints reported to the utility by CAB broken down by complaint type, including but not limited to high bills, deposit refunds, water quality, etc.					
Response 6:					
	2015	2016	2017	2018	2019
a. Total number of customers.	283,088	283,987	283,229	284,388	285,264
b. Total number of complaints reported annually to the utility by the California Public Utility Commission's Consumer Affairs Branch (CAB).	63	52	52	42	26
c. Complaints reported to the utility by CAB broken down by complaint type, including but not limited to high bills, deposit refunds, water quality, etc.					
Informal Complaint Type	2015	2016	2017	2018	2019
Billing/High Bill/Rates	43	21	36	27	18
Pressure	0	0	0	0	0
Water Quality	7	3	0	0	1
Leaks	2	0	0	0	0
Service/Other	11	16	8	10	8
Total:	63	40	44	37	27

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**ATTACHMENT 4-3: GSWC MEASURES TO
IMPROVE CUSTOMER SERVICE REPORT
(JULY 2015- DEC. 2015), AT P. 5.**

Customer Service Center Statistics

The Customer Service Center (CSC) received a total of 406,429 calls in 2015, which was 17,519 calls less or 4% lower than the 423,948 total calls received in 2014. The table below details the service level statistics for each month:

2015 MONTHLY PHONE STATISTICS						
Month	NO. OF CALLS			Daily Abandonment Rate	Average Speed of Answer	Month-to-Date % Answered in ≤30 seconds
	Answered	Abandoned	Total Calls			
January	33,122	1,238	34,360	3.60%	0:00:32	74.74%
February	27,956	675	28,631	2.36%	0:00:20	83.00%
March	31,448	841	32,289	2.60%	0:00:23	80.74%
April	31,967	917	32,884	2.79%	0:00:28	79.27%
May	32,842	1,468	34,310	4.28%	0:00:38	71.21%
June	39,711	3,684	43,395	8.49%	0:01:30	55.12%
July	37,101	1,910	39,011	4.90%	0:01:06	71.38%
August	35,324	934	36,258	2.58%	0:00:24	81.71%
September	32,522	667	33,189	2.01%	0:00:21	85.04%
October	32,438	704	33,142	2.12%	0:00:22	84.15%
November	27,501	680	28,181	2.41%	0:00:22	82.31%
December	29,938	841	30,779	2.73%	0:00:32	79.18%
2015 YTD Totals	391,870	14,559	406,429	3.58%	0:00:35	76.73%

The CSC was able to achieve a service level of < 5% abandonment rate, keeping it down to 3.58%. However, the service level to answer 80% of total calls in ≤30 seconds was not achieved. The CSC answered 76.73% or 300,682 in ≤30 seconds out of the 391,870 total calls answered, resulting in an overall average speed of answer of 35 seconds per call. The service levels were not met specifically in May, June, and July when the highest monthly call volumes for the year were received. The total calls received during the same three-month period was 7% or 7,673 calls more than the total received for the same period in 2014, greatly due to the customers' response to notifications about the state-wide drought restrictions and water conservation targets. The CSC utilized part-time temporary Customer Service Representatives (CSR) to fill vacancies. This provided the CSC the flexibility to quickly change the CSR staff's schedules and respond to fluctuations in call volumes as well as handle drought related calls which helped improve service levels to ≥80% after July 2015.

Water Operations Training

For this reporting period, GSWC designed and delivered training modules in support of the Company's goal to improve service levels. They were developed to ensure the delivery of high quality service through effective field investigations, accurate billing, and proactive communication with customers. All the modules highlighted the importance of taking careful

**ATTACHMENT 4-4: EMAIL FROM THOMAS
WARD (CAB) TO PHONG LY (CAL
ADVOCATES), DATED AUGUST 17, 2020**

From: Ward, Thomas <thomas.ward@cpuc.ca.gov>
Sent: Monday, August 17, 2020 10:27 AM
To: Ly, Phong <Phong.Ly@cpuc.ca.gov>
Cc: Solomon, Alan H. <Alan.Solomon@cpuc.ca.gov>
Subject: RE: Request for Contact Data Received by CAB from GSWC Customers 2015-2019

Hi Phong,

Below per your request, are the total number of contacts (**1,034**) for calendar years 2015 - 2019 re Golden State Water Company, parsed according to Contact Type, by year, using the chart you provided. Let me know if you have any questions.

Thanks!
Tom

From: Ly, Phong <Phong.Ly@cpuc.ca.gov>
Sent: Monday, August 10, 2020 10:15 AM
To: Ward, Thomas <thomas.ward@cpuc.ca.gov>
Subject: Request for Contact Data Received by CAB from GSWC Customers 2015-2019

Good morning Thomas,

I am currently reviewing Golden State Water Company's (GSWC) ability to resolve customer disputes for its upcoming general rate case. I was wondering if you were able to provide the total number of contacts by contact type received by the Consumer Affairs Branch from GSWC customers per year from 2015-2019 in the following table:

Contact Type	2015	2016	2017	2018	2019
Complaint	12	6	9	15	11
Informal Complaint	55	43	49	36	29
Impound	9	3	3	2	0
Phone Contact	228	151	154	129	84
Inquiry	0	2	0	4	0
Total Contacts	304	205	215	186	124

Thank you for your assistance. Please let me know if you have any questions.

Best,

Phong

Phong Ly | Utilities Engineer
Public Advocates Office www.publicadvocates.cpuc.ca.gov
California Public Utilities Commission www.cpuc.ca.gov
Mobile:
Phong.Ly@cpuc.ca.gov

ATTACHMENT 4-5: GSWC RESPONSE TO
PUBLIC ADVOCATES DR JMI-014



November 4, 2020

Justin Menda, Public Advocates Office
CALIFORNIA PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco, CA 94102

Subject: Data Request JMI-014 (A.20-07-012)
Customer Complaint Resolution Response
Due Date: November 6, 2020

Dear Justin Menda,

In response to the above referenced data request number, we are pleased to submit the following responses:

Question 1:

Please confirm whether or not GSWC has an internal customer complaint resolution procedure.

Response 1:

Yes, GSWC has an internal customer complaint resolution procedure that is followed as informal complaints are received.

Question 2:

If GSWC has an internal customer complaint resolution procedure, please provide an overview of the procedure.

Response 2:

See attached file "CPUC Informal Complaints Process".

If you have any questions, please do not hesitate to call me at (909) 394-3600, Extension 680.

Sincerely yours,

For Keith Switzer

Vice President – Regulatory Affairs

c: Eileen Odell, Project Lead
Shanna Foley, Attorney for Public Advocates Office
Joseph Karp, Attorney for GSWC
Chris Kolosov, Attorney for GSWC
Jenny Darney-Lane, Manager of Regulatory Affairs
Jon Pierotti, Manager of Regulatory Affairs

ATTACHMENT 4-6: GSWC CUSTOMER
SERVICE PROCEDURES, CPUC
COMPLAINT PROCESS

CPUC Complaints

Introduction The California Public Utilities Commission has an informal complaint process that allows customers to voice their concerns/complaints for resolution.

Background This procedure complies with the following CPUC Rules:

Rule	Description
No. 10	Disputed Bills

In this Procedure

Topic	See Page
Guidelines	2
Roles	7
How to Save the Informal Complaint (Regulatory Affairs Group)	9
How to Lodge an IC Case (Regulatory Affairs Group)	10
How to Transition a Case (CPUC Process Group)	11
Superintendent Case Management	12
District Manager IC Case Management	14
How to Transition a Case (Regulatory Affairs Group)	15
How to Complete the IC ToDo (CPUC Process Group)	16

Guidelines

Overview	<p>A revised informal complaint process was implemented for Company-wide use. This process calls for the distribution and tracking of all informal complaints received by the company by processing them as “cases” in CC&B.</p> <p>All informal complaints are funneled through Special Projects in Regulatory Affairs, forwarded to the CPUC Process Group which then forwards the Informal Complaint to the corresponding superintendent, manager and vice president.</p> <p>A CPUC Informal Case will be created which will track the dates when the case transitions from one group to another.</p>
Types of Complaints	<p>There are three categories of CPUC Customer Complaints: Referrals, Informal Complaints, and Formal Complaints.</p>
Referrals	<p>A customer who may have previously contacted the Company may be requested by the CPUC – Consumer Affairs Branch to attempt to resolve the complaint through Company channels; the CPUC may contact the Company with customer information and request the Company to make the initial contact. The CPUC may or may not request a telephone briefing or letter as to the findings and resolution.</p>
Informal Complaints	<p>A customer who may have attempted to resolve a complaint through Company channels may file an Informal Complaint (I.C.) with the CPUC – Consumer Affairs Branch; monies may or may not be impounded at such time. The CPUC assigns an Informal Complaint number to the complaint and forwards the case to the Company, along with details and/or documents regarding the complaint, and with their Response checklist.</p> <p>A written response to the CPUC is prepared by the Company upon completion of its investigation, in compliance with all requested information within the specified time frame, normally 20 working days.</p> <p>The majority of CPUC Informal Complaints involve service related issues experienced by customers in the CSAs. In some cases, the Company may receive Informal Complaints relating to issues in other areas of the Company, such as the CSC or Asset Management. In these instances, supervisory personnel in the applicable department will conduct the investigation and prepare the response for the appropriate District Manager’s signature.</p>

Continued on next page

Guidelines, Continued

Formal Complaints

A customer who wishes to file a Formal Complaint, foregoing or following the I.C. step, may do so. Complaints brought before the Commission are handled in a manner similar to a civil action before a trial court.

In formal proceedings, one of the CPUC commissioners is assigned to the case; an Administrative Law Judge (ALJ) conducts public hearings, advises the commissioner of major developments and issues and prepares a recommended decision for Commission vote.

After a customer has filed a Formal Complaint, the CPUC docket clerk notifies the Company of the filing of the Complaint by issuance of a "Notification and Instructions to Answer." The Company must respond within 30 days.

Upon receipt of the Company's response, a hearing date will be set, occasionally preceded by a pre-hearing conference. Oral and written testimony is given under oath, and is subject to cross-examination.

IC Case Lifecycle/ Overview

The informal complaint process has a specific path that it follows.

Status	Description
Lodged	Case has been started
CPUC PROCG	Forwarded to the CPUC Process Group
SUPTINV	Forwarded to Superintendent for Investigation/Processing
ESDM	Forwarded to District Manager
NREG	Notification to Regulatory Affairs
REM-10D	10-day Reminder (status)
REM-20D	20-day Reminder (due)
REM-25D	25-day Reminder (past due)
IFAR	Impounded Funds Awaiting Resolution
CANCEL	Cancel the Case
COMPLETE	Case Completed
FIELD	Requires Field Investigation
REBILL	Submitted to Cancel and Rebill

Continued on next page

Guidelines, Continued

Components of IC Process	Below are descriptions of the various components of the Informal Complaint Procedure and how to process when one is received.
Monitoring Log	<p>CPUC Informal Complaints Monitoring Log is located at I:\Shared\CPUC Logs\''YYYY'\ 'YYYY' Informal Complaints Log. The CSC CPUC Process Group and Regulatory Affairs Analyst have update capabilities. All other employees have access on a "view only" basis. The ICs are logged in a single Company-wide file for each year, with a separate tab for each district. Monitoring Log includes the following data:</p> <ul style="list-style-type: none">• the date of receipt• critical points of handling• date of forwarding to those critical points of handling• the response date to CPUC• account information• Informal Complaint number
Disputed Service Agreement	<p>A Disputed Service Agreement allows any disputed bill to be pulled out of the collection process. When a bill is transferred to a Disputed SA, the customer no longer receives collection notices (i.e. reminders or door notices) for that bill.</p> <p>The collection process for any bills not in dispute continue with the usual collection events.</p> <p>Any informal Complaint, regarding a high bill, will have the total amount of that bill transferred to a Disputed SA.</p>
Impounded Funds	<p>A customer may impound funds for the bill amount with the CPUC. If the funds are impounded, the disputed bill amount stays on the Disputed SA until the funds are disbursed by the CPUC.</p>

Continued on next page

Guidelines, Continued

**Follow-up on
transmittal
sheets**

If a confirmation email is not received within 2 days, the CPUC Process Group will e-mail those persons that have not responded asking for their reply. Below is a sample e-mail asking for the information:

"A CPUC informal complaint (#xx-xx-xxxx) was faxed to you on <<date>> for <<Customer name>> (acct# xxxxxx-x). Please fax the completed transmittal sheet at your earliest convenience."

Case Log

Each case has its own log within CC&B; a Log tab. There are automated log entries when the Case transitions from one state to another and also manual entries.

Manual entries should be made each time an attempt is made to contact the customer. An entry should also be made when other pertinent action is taken.

**Complaint
Status Updates
and Inquiries**

At specified points in the I.C. process, ToDos and emails will be automatically sent with status inquiries / reminder notices for each open I.C. An entry is made in the Log within CC&B each time a reminder is sent out.

- 10-day Status Inquiry to the Superintendent, with copy to the District Manager and Regulatory Affairs – Special Projects
- 20-day Late Notice to the Superintendent, with copy to the District Manager, Vice President, and Regulatory Affairs
- 25-day Delinquent Notice to the Superintendent, with copy to the District Manager, Vice President, Senior VicePresident, and Regulatory Affairs
- A weekly report of all I.C. activities is created. Location: I:/Shared/CPUC Logs/YYYY/Summary of YYYY CPUC Complaints

The I.C. is considered open until the response is received by the CSC CPUC Process Group.

**Weekly Status
Updates**

Every Monday, a count of total IC received, the number pending and the due dates for those pending is e-mailed to Customer Service Center Manager and Supervisors.

Location: I:/Shared/CPUC Logs/YYYY/Summary of YYYY CPUC Complaints

Continued on next page

Guidelines, Continued

Resolution Letter	When the CPUC sends its Resolution letter, and any applicable impounded funds, the CSC CPUC Process Group will update the Informal Complaint Log with these dates, and consider the I.C. closed. A copy of the Resolution letter and a photocopy of the check will be internally distributed to the CPUC Process Group and to Regulatory Affairs within two (2) days.
Petition Letter	If the impounded funds are not received within two (2) months, Regulatory Affairs will send a Petition Letter requesting that the CPUC close the I.C. and petition the release of the impounded funds, if applicable. (See Item 2.)
Informal Complaint Retention	The official Company copy of all Informal Complaints will be retained by the CSC. I.C.'s are to be retained for a period of six (6) years.

Roles

Overview	The processing of an informal complaint is accomplished by various roles in the Company. Below are the roles along with the necessary steps each needs to take to process the complaint.
Single Point of Contact	<p>The Company's single point of contact for the CPUC is the Regulatory Affairs group. All phone contacts, which may include requests for extensions, clarification on the complaint, etc. with the CPUC regarding an I.C. shall be through the Regulatory Affairs group. As the original recipient of the I.C., the Regulatory Affairs group makes the initial entry indicating the following points:</p> <ul style="list-style-type: none">• CPUC I.C. #,• the date received by Regulatory Affairs• the date forwarded CSC CPUC Process Group• the due date for the Informal Complaint• complaint category (reason)
Regulatory Affairs	Regulatory Affairs designee lodges the CPUC Informal Complaint Case <u>within 24 hours</u> of having received the IC.
CPUC Process Group	Once the IC Case is lodged by Regulatory Affairs, notification of the Case will be sent as a ToDo in their work queue. A member of the CPUC Process Group will assume responsibility for processing the Case once lodged.
Superintendent	<p>The Superintendent is responsible for researching and conducting the investigation into the customer's complaint, and making contact with the customer in an effort to resolve the complaint.</p> <p>The Superintendent will receive a ToDo in their work queue, as well as an email. Opening the ToDo takes you to the Case. Dependent on the subject of the Informal Complaint, a field investigation may be required or it may be an office investigation that is needed.</p> <p>Previous cases that may be relevant to this Informal Complaint should be reviewed for any pertinent information. A list of closed and pending cases can be found, by clicking on the Account – Context Menu and clicking on “Go To Case.”</p> <p>Once the investigation is completed, whether it was an office investigation or a field investigation, a response is drafted <u>within 15 days</u> of receiving the IC.</p>

Roles, Continued

District Manager	<p>The District Manager receives a ToDo and an email in his/her work queue. Upon receipt of the ToDo, the District Manager will review the draft response, revising as appropriate, and finalize the response letter <u>within five (5) days</u> of receiving draft from the Superintendent.</p> <p>Scan and distribute response via e-mail <u>within two (2) days</u> of the final response. Full internal copies are distributed to the Vice President, District Manager, Superintendent, Regulatory Affairs, and the CSC CPUC Process Group.</p>
Regulatory Affairs IC Group	<p>Regulatory Affairs will receive a ToDo once the District manager sends the response. The Regulatory Affairs IC Group is responsible for submitting the final response to the CPUC <u>within 24 hours</u> after being notified by the District Manager.</p>
CPUC Process Group	<p>A member of the CPUC Process Group will assume responsibility for completing the processing of the Case by saving an electronic copy of the response in I:\SHARED\CPUC Logs\YYYY.</p> <p>The CSC CPUC Process Group will enter the response date to the CPUC in the log on the Case and on the monitoring log (I:\Shared\CPUC Logs\''YYYY''\''YYYY'' Informal Complaints Log , as indicated on the letter response within one (1) day.</p>

How to Save an Informal Complaint (Regulatory Affairs Group)

CPUC Informal Complaint Receipt The Informal Complaint (IC) can be received by mail or it can be submitted electronically. The Regulatory Affairs designee follows the steps below within 24 hours, when an IC is received.


Step	Action
1	Create a folder named after the customer and save to I:\SHARED\CPUC Logs\YYYY . *
2	Save an electronic copy of the complaint to the folder with the customer's name. *
3	Log the information in the YYYY Informal Complaint Log Location: I:/Shared/CPUC Logs/YYYY/YYYY Informal Complaint Log *

*Indicates process *outside* of CC&B

How to Lodge an IC Case (Regulatory Affairs Group)

Procedure
(continued)

Upon receipt of the Informal Complaint, the following steps are to be performed by
Regulatory Affairs.

Step	Action
1	Begin at Control Central.
2	Search for Customer Account (Account ID, Premise or other field).
3	From the Dashboard (located on the right hand side of the screen), in the Current Context zone, click on the "Account Context Menu" button.
4	Select "Go To Case" and click the "Add" button. <u>Result:</u> Case Notebook populates
	From the "Case Type" field, click the "Search" button  .
5	Click on the binocular icon and select "Public Utility Commission Informal Complaints". <u>Result:</u> The following fields populate: <ul style="list-style-type: none">• Person• Account• Premise• Responsible User• Contact Person
6	Enter a summary of the complaint on the "Comment" field, including the CPUC IC number and the due date.
7	From the "Preferred Contact Method" field, click on the drop down list and select applicable Contact Method.
8	Enter any appropriate notes in the "Contact Instructions" field.
9	Click the "Save" button <u>Note:</u> The Case will be assigned an individual Case ID number
10	Press the "Notify CPUC Process Group" button. <u>Note:</u> This will send a ToDo and an email to the CPUC Process Group. The ToDo and the email will reference the Case ID, which will have Case information such as customer's name and account number.

How to Transition a Case (CPUC Process Group)

Procedure The steps below are to be completed within 24 hours of receipt of notification of the IC and are to be performed by the CPUC Process Group.

Step	Action						
1	From Menu bar, click on the ToDo button. <u>Result:</u> ToDo Summary Page populates						
2	Select the ToDo pertaining to the IC Case. <u>Result:</u> Customer Account and Case Notebook will populate						
3	Use the table below to determine the next step: <table><tr><th>IF...</th><th>Then...</th></tr><tr><td>The IC is a Billing Dispute</td><td><ul style="list-style-type: none">• If the Informal Complaint is a billing dispute, create a Disputed SA. Refer to Procedure No. 35, Transferring Monies, "How to Create a Disputed SA"• From the Alerts zone located in the Dashboard, Click on "PUC Informal Complaint Case".• Go to step 4</td></tr><tr><td>The IC is <i>not</i> a Billing Dispute</td><td><ul style="list-style-type: none">• Go to step 4</td></tr></table>	IF...	Then...	The IC is a Billing Dispute	<ul style="list-style-type: none">• If the Informal Complaint is a billing dispute, create a Disputed SA. Refer to Procedure No. 35, Transferring Monies, "How to Create a Disputed SA"• From the Alerts zone located in the Dashboard, Click on "PUC Informal Complaint Case".• Go to step 4	The IC is <i>not</i> a Billing Dispute	<ul style="list-style-type: none">• Go to step 4
IF...	Then...						
The IC is a Billing Dispute	<ul style="list-style-type: none">• If the Informal Complaint is a billing dispute, create a Disputed SA. Refer to Procedure No. 35, Transferring Monies, "How to Create a Disputed SA"• From the Alerts zone located in the Dashboard, Click on "PUC Informal Complaint Case".• Go to step 4						
The IC is <i>not</i> a Billing Dispute	<ul style="list-style-type: none">• Go to step 4						
4	The designee will press the "Superintendent Investigation" button. <u>Result:</u> This will send a ToDo and an email, to the corresponding Superintendent, District Manager and Vice President. This will reference the Case ID, which will have Case information such as customer's name and account number.						
5	Locate and print a hard copy of the IC from the I drive.*						
6	Create and label a folder with the customer's name and place hard copy in the folder to be filed at the CSC.* <u>Note:</u> Folder to be maintained in CSC						

*Indicates a process *outside* of CC&B

Superintendent IC Case Management

Procedure The steps below are to be completed by the Superintendent. Each recipient must send an email to the CPUC Process Group (CSC CPUC Process Group) within 48 hours acknowledging receipt of the IC notification.

Step	Action						
1	Main Menu, click on the ToDo button. <u>Result:</u> ToDo Summary zone populates.						
2	Select the ToDo pertaining to the IC Case. <u>Result:</u> Customer Account and Case Notebook will populate						
3	Use the table below to determine the next step: <table><tr><th>IF...</th><th>Then...</th></tr><tr><td>A Field Investigation is needed</td><td><ul style="list-style-type: none">• Press the "Field Investigation button."• Create a Field Activity. Refer to Procedure No. 61 Field Activity and Field Order (s) for details.• Go to Step 4<u>Note:</u> This will place the IC in "Field Investigation" status.</td></tr><tr><td>A Field Investigation is <i>not</i> needed</td><td>Go to Step 4</td></tr></table>	IF...	Then...	A Field Investigation is needed	<ul style="list-style-type: none">• Press the "Field Investigation button."• Create a Field Activity. Refer to Procedure No. 61 Field Activity and Field Order (s) for details.• Go to Step 4 <u>Note:</u> This will place the IC in "Field Investigation" status.	A Field Investigation is <i>not</i> needed	Go to Step 4
IF...	Then...						
A Field Investigation is needed	<ul style="list-style-type: none">• Press the "Field Investigation button."• Create a Field Activity. Refer to Procedure No. 61 Field Activity and Field Order (s) for details.• Go to Step 4 <u>Note:</u> This will place the IC in "Field Investigation" status.						
A Field Investigation is <i>not</i> needed	Go to Step 4						
4	Go to "Log" tab located at the top of the notebook.						
5	Update Case Log with contact attempts and contact date as well as major points of the investigation.						

Continued on next page

Superintendent IC Case Management, Continued

Procedure
(continued)

Once the investigation is completed, whether it was office investigation or a field investigation, a response is drafted within 15 days of receiving the IC.

Step	Action
1	Prepare a draft response to the Informal Complaint, and forward it to the District Manager, along with any back-up documents. The response shall include a separate list indicating all applicable items on page two of the IC (the CPUC Check List) and how each item was addressed.*
2	From Menu bar, click on the ToDo button.
3	Select the ToDo pertaining to the IC Case. Result: Customer Account and Case Notebook will populate
4	From the Alerts zone located in the Dashboard, Click on "PUC Informal Complaint Case".
5	Press the "Escalate to District Manager" button. Result: This will send a ToDo and an email to the corresponding District Manager.

*Indicates a process *outside* of CC&B

District Manager IC Case Management

Procedure The steps below are to be completed by the District Manager. A ToDo and an email will be received in his/her work queue.

Step	Action
1	Review the draft response, revising as appropriate, and finalize the response letter <u>within five (5) days</u> of receiving draft from the Superintendent. *
2	Mail the response letter, along with any documents, to the customer.*
3	Scan and distribute response via e-mail <u>within two (2) days</u> of the final response. Full internal copies are distributed to the Vice President, District Manager, Superintendent, Regulatory Affairs, and the CSC CPUC Process Group.*
4	From Menu bar, click on the ToDo button.
5	From Main Menu, go to “To Do” and select “To Do List”.
6	Click the appropriate “To Do” hyperlink for IC (open status only) Result: Case Notebook populates
7	Press the “Notify Regulatory Affairs” button. Result: This will send a ToDo and an email to the Regulatory Affairs Group.

*Indicates a process *outside* of CC&B

How to Complete a Case (Regulatory Affairs Group)

Procedure The steps below are performed by the Regulatory Affairs IC Group. The final response to the CPUC shall be submitted within 24 hours after being notified by the District Manager.

Step	Action	
1	Forward an electronic copy of the IC response to the CPUC.*	
2	Begin at Control Central	
3	From Main Menu, go to “To Do” and select “To Do List”.	
4	Click the appropriate “To Do” hyperlink for IC (open status only)	
	Result: Case Notebook populates	
5	IF...	Then...
	Funds have been Impounded	<ul style="list-style-type: none">• Press the “Impounded Funds Awaiting Resolution” button.
	Funds have not been impounded and/or funds have been released.	<ul style="list-style-type: none">• Press “Complete”.

*Indicates a process *outside* of CC&B

How to Complete the IC ToDo (CPUC Process Group)

Procedure The steps below are performed by the CPUC Process Group. The Process Group will assume responsibility of completing the processing of the Case.

Step	Action						
1	Use the table below to determine your next step:						
	<table><tr><th>IF...</th><th>Then...</th></tr><tr><td>The Account has a Disputed SA</td><td><ul style="list-style-type: none">• Complete the Disputed SA. Refer to Procedure No. 35, Transferring Monies, "How to Complete a Disputed SA"• Go to step 2</td></tr><tr><td>The Account does not have a Disputed SA</td><td><ul style="list-style-type: none">• Go to step 2</td></tr></table>	IF...	Then...	The Account has a Disputed SA	<ul style="list-style-type: none">• Complete the Disputed SA. Refer to Procedure No. 35, Transferring Monies, "How to Complete a Disputed SA"• Go to step 2	The Account does not have a Disputed SA	<ul style="list-style-type: none">• Go to step 2
	IF...	Then...					
The Account has a Disputed SA	<ul style="list-style-type: none">• Complete the Disputed SA. Refer to Procedure No. 35, Transferring Monies, "How to Complete a Disputed SA"• Go to step 2						
The Account does not have a Disputed SA	<ul style="list-style-type: none">• Go to step 2						
2	Complete the IC ToDo. Refer to Procedure No. 121 ToDo Management for details.						
3	Save an electronic copy of the response in the folder named for the customer in I:\SHARED\CPUC Logs\YYYY.*						
4	Enter the response date to the CPUC in the log on the Case and on the monitoring log (I:\Shared\CPUC Logs\YYYY\YYYY Informal Complaints Log, as indicated on the letter response within one (1) day.*						

*Indicates process *outside* of CC&B